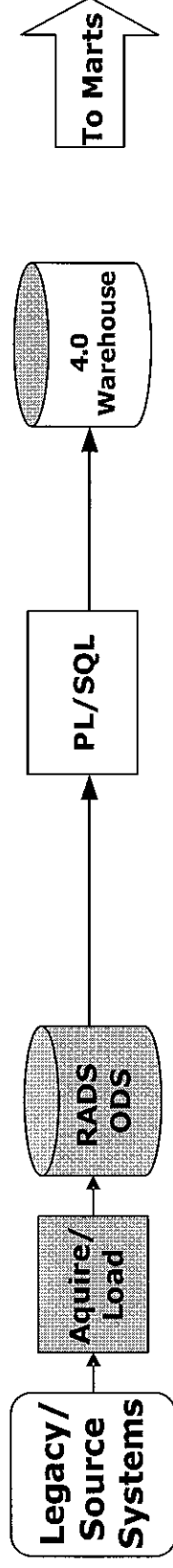


## PMAP 4.0



## PMAP 2.6

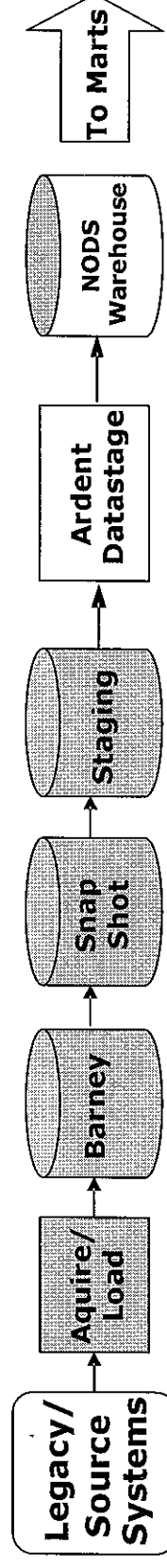


Diagram 1

## Evolution and Implementation of PMAP 4.0

Since 1997, BellSouth has invested significant resources in the development of computing platforms that allow the Company to demonstrate that its performance meets the requirements of the Telecommunications Act of 1996. Consistent with orders of state commissions establishing performance metrics for BellSouth, these platforms are used to generate performance reports that are provided to the Federal Communications Commission (FCC), state Public Service Commissions (PSC), and Competing Local Exchange Carriers (CLEC). These performance reports also are used by organizations within BellSouth to target areas for operational performance improvement.

The primary computing platform used by BellSouth in collecting and reporting performance data is BellSouth's Performance Measurement and Analysis Platform (PMAP). BellSouth is currently in the process of upgrading PMAP to Version 4.0 from Version 2.6. This upgrade is part of the evolution of PMAP, which is outlined briefly in the following chart:

<b>PMAP Environment Release</b>	<b>Implementation Date</b>	<b>Notes</b>
Pre-PMAP manual processing	9/97	
PMAP 1.0	3/99	
PMAP 2.0	10/99	
PMAP 2.5	6/01	Georgia Order
PMAP 2.6	8/01	Louisiana Order
PMAP 2.x	Monthly Updates	Scheduled incremental changes
<b>PMAP 4.0</b>	<b>3/02</b>	<b>Scheduled</b>
PMAP 4.x	Monthly Updates	Scheduled incremental changes 4.01 – 4.23
PMAP 5.0	3/03	
PMAP 6.0	TBD	

The upgrade to PMAP Version 4.0 is a normal sequence in BellSouth's data processing capabilities that will allow BellSouth to better meet the needs of its customers and the demands of the business and to comply with the requirements of BellSouth's regulators. As the number of performance measurements and levels of disaggregation continue to grow, a more dynamic platform is required, which has necessitated the upgrade to PMAP Version 4.0. In fact, BellSouth is already exploring the next version of the PMAP platform, which has been termed PMAP 5.0, as BellSouth expects that external and internal demands will dictate further enhancements to the PMAP architecture.

Nonetheless, even with the upgrade to PMAP Version 4.0, the fundamental process used by BellSouth in reporting its performance (i.e., sourcing of data, application of business rules, the production of reports and output distribution) will remain substantially unchanged. An overview of the architectures used by PMAP Versions 2.6 and 4.0 is illustrated in Diagram 1. As depicted in this diagram, the following changes will be made with the upgrade to PMAP Version 4.0:

- The replacement of the Barney server with the Regulatory Ad-hoc Database System (RADS), which will continue to receive the same Legacy/Source data (i.e.: LMOS, SOCS, etc.)
- The change in the warehousing of PMAP raw data from the Normalized Object Data Store (NODS) Warehouse to the 4.0 Warehouse
- The change in software code from DataStage to PL/SQL as the Legacy/Source data is transitioned from Barney and NODS to RADS and the 4.0 Warehouse; however, both the DataStage and PL/SQL code are based on the same set of business rules and system requirements
- The reconfiguration of the output process will continue to utilize the same delivery vehicles (i.e. 271 Charts, MSS, Web based SQM) that can be found today at the PMAP Website (<https://pmap.bellsouth.com/>)

The key advantages of the upgrade to PMAP Version 4.0 are:

- Improved data acquisition processors – scaling, redundancy, modern hardware
- Simplified code – easier to maintain, processes data faster, simplified auditing capability

BellSouth has performed and is currently performing extensive testing of the data used in the PMAP 2.6 and 4.0 versions. Production validation teams are examining every service order, trouble ticket, and service request from both the PMAP 2.6 and 4.0 version code, and comparing results for every report product that is produced. The next phase of testing will occur with the March 2002 processing cycle of February 2002 data when PMAP Version 4.0 will be run in full production in parallel with PMAP Version 2.6. A similar parallel test will be conducted in April 2002 for March 2002 data. During this testing, there will be slight differences in the reported results since PMAP Version 4.0 provides enhanced product level identification, but any differences resulting from use of the new code will be documented. Until testing is complete and PMAP Version 4.0 is released, which should occur with April 2002 data in May 2002, BellSouth will continue to report performance data using PMAP Version 2.6.

## PMAP 4.0 Impact on the GA Metrics Audit

KPMG Consulting is currently in the midst of auditing BellSouth's performance metrics as part of the Georgia third-party test that is being conducted under the direction of the Georgia Public Service Commission. The transition to PMAP Version 4.0 will have no adverse impacts on KPMG Consulting testing, and there is every reason to believe that this upgrade will actually facilitate the conclusion of their work. Outlined below is brief summary of the impact of the PMAP Version 4.0 upgrade on the KPMG Consulting metric audit in Georgia.

### PMR1: Data Collection and Storage

The objective of the Data Collection and Storage Verification and Validation Review is to evaluate the key policies and procedures for collecting and storing both the raw data that BellSouth uses to create Service Quality Measurement (SQM) reports, and the preliminary data that BellSouth uses to produce the raw data.

Process	Sub-Process	Evaluation Measure
Collection of Data	Data collection policies & procedures for CLEC and retail data	Adequacy and completeness of data collection policies and procedures
	Identified data collection control points	Applicability of and measurability from control points
	Data collection tools	Adequacy and scalability of data collection tools
	Internal controls	Adequacy and completeness of the internal control process
Storage of Data	Data storage policies & procedures for CLEC and retail data	Adequacy and completeness of data storage policies and procedures
	Identified storage sites	Applicability of and measurability from control points
	Data storage tools	Adequacy and scalability of data storage tools



Process	Sub-Process	Evaluation Measure
	Internal controls	Adequacy and completeness of the internal control process

GA Status – 90 % Complete

PMAP 4.0 Upgrade Impact—KPMG Consulting will conduct interviews and review documentation associated with the upgrade to PMAP Version 4.0. The overall impact of integrating the Version 4.0 upgrade into this test is minimal.

## PMR2: Standards and Definitions

The objective of the Metrics Definition Documentation and Implementation Verification and Validation Review is to evaluate the definitions of the SQMs and the associated descriptions of the calculations in the SQM documentation. This review evaluates the completeness and logic of the stated definitions and calculations, as well as their mutual consistency.

Process	Sub-Process	Evaluation Measure
All Measures	All Sub-Metrics	Adequacy and completeness of the SQM definition
		Adequacy, completeness, and logic of the SQM calculation description
		Consistency between (a) the SQM calculation description and exclusions, and (b) computation instructions provided by BLS
		Consistency between the stated exclusions and their implementation in the raw data creation process

GA Status

	<u>Month I</u>	<u>Month II</u>	<u>Month III</u>
Satisfied	74	74	70
In Progress	0	0	4
% Complete	100%	100%	95%

PMAP 4.0 Upgrade Impact—The SQM standards and definitions remain the same so the Version 4.0 upgrade will have no impact on this test.

**PMR3: Change Management**

The objective of the Metrics Change Management Verification and Validation Review is to evaluate BellSouth's management of changes related to the production of its SQMs, including changes in the various legacy/source systems used to provide data for SQM calculations.

Process	Sub-Process	Evaluation Measure
Change Management	Development of change proposals	Completeness and consistency of the change development process
	Evaluation of change proposals	Completeness and consistency of the change evaluation process
	Implementation of changes	Completeness and consistency of the change implementation process
	Determination of change intervals	Reasonableness of the change interval
	Updating of documentation	Timeliness of documentation updates
	Tracking of change proposals	Adequacy and completeness of the change management tracking process

GA Status—85% Complete

PMAP 4.0 Upgrade Impact –The Change Management process remains the same so the Version 4.0 upgrade will have no impact on this test.

**PMR 4: Data Integrity**

The objective of the Metrics Data Integrity Verification and Validation Review is to evaluate the accuracy and completeness of the SQM raw data produced by BellSouth. The evaluation also assesses the adequacy and completeness of the related data transfer processes and the internal controls on those processes.

Process	Sub-Process	Evaluation Measure
All Measures	All Sub-Metrics	Accurate transformation of the earlier stage data into raw data i.e., no differences in data values
		Complete transformation of the earlier stage data into raw data i.e., no inappropriate omissions of earlier stage data

Process	Sub-Process	Evaluation Measure
Data Transfer Policies	Data transfer policies and procedures for CLEC and retail data	Adequacy and completeness of data transfer policies
Internal Control	Internal controls on data transfer for CLEC and retail data	Adequacy and completeness of internal control process

#### GA Status—27% Complete

- 14 Metrics completed in Audit I  
(including the LSR Detail Report)
- 6 Metrics completed in Audit III
- 17 Metrics in progress
- 37 Metrics have not been started

In understanding the impact of the upgrade to PMAP Version 4.0 on PMR 4, it is important to distinguish those measures calculated manually and to understand the process used by KPMG Consulting in evaluating the accuracy and completeness of the SQM raw data.

There are several performance metrics (such as the Billing and Collocation metrics) for which the data is calculated manually and fed directly in the NODS Warehouse. Several of these metrics have already been audited successfully by KPMG, and the upgrade to PMAP Version 4.0 will have no impact on these completed measures, because the only change involves feeding the data directly into the 4.0 Warehouse rather than the NODS Warehouse. For the remaining manual metrics for which auditing is not complete, KPMG Consulting will integrate the Version 4.0 upgrade into its metrics testing.

For the performance metrics for which data is gathered and calculated electronically, the data integrity portion of the audit tests the integrity of metric related data as it flows from the Legacy systems to the data store (Barney for PMAP Version 2.6 and RADS for PMAP Version 4.0), then to PMAP Staging and then finally to PMAP NODS, which is depicted in Diagram 1. The movement of the data from the Legacy systems to PMAP Staging is straightforward. The format and names of data remain the same, and the data are selected and processed with common off-the-shelf tools and code. KPMG Consulting has validated this portion of the data integrity audit.

The next stage of PMAP converts records of different format to a single format for each major category (Ordering, Provisioning, Maintenance) for rapid report summarization in tables. Auditing the processing of data between PMAP Staging and PMAP NODS is a time-consuming exercise, particularly with the thousands

of levels of disaggregated products. The reasons are twofold. First, the data processing stage involves large data files that are transitioned to tables, which takes considerable time to review. Second, the tool used to perform this data transition is an off the shelf software package known as DataStage. DataStage uses code that is not documented in such a way that it is easy to audit. As illustrated in Attachment 1, DataStage code creates multiple paths from which data are pulled into the central process and if one path is not included, the end result will be different. KPMG Consulting is attempting to build their own code to duplicate the DataStage mappings, which takes a considerable amount of time. By contrast, PMAP Version 4.0 utilizes PL/SQL code, which is an open architecture format that is more conducive to an audit. Another factor that inhibits the appearance of progress is that the data integrity test is conducted at the family of measure level (Ordering, Provisioning, Maintenance), not at the measure level. As KPMG Consulting identifies issues such as the appearance of multiple instances of service orders, they halt testing families of measures until the issue is investigated and resolved.

KPMG Consulting will continue to audit the DataStage code used in PMAP Version 2.6, but will integrate the testing of PL/SQL code used in PMAP Version 4.0 as BellSouth completes the PMAP upgrade.

#### **PMR 5: Replication – SQM Reports & 271 Charts**

The objective of the Calculation and Reporting Verification and Validation Review is to evaluate the accuracy of the information produced by BellSouth's SQM and Monthly State Summary (MSS) report production processes. In this evaluation, KPMG Consulting determines whether BellSouth's SQM and MSS calculations are accurately reported for all CLECs combined ("the CLEC aggregate") and for BellSouth retail.

Process	Sub-Process	Evaluation Measure
All Measures	All Sub-Metrics	Accuracy and completeness of reported performance measure disaggregation levels
		Agreement between KCI-calculated and BLS-reported SQM values

#### **GA Status**

##### **SQM Reports—84%Complete**

	<u>Month I</u>	<u>Month II</u>	<u>Month III</u>
Audit I Satisfied (including the LSR Detail Report)	15	15	15

Audit III Satisfied	51	45	36
In Progress	3	0	0
Not Started	2	11	20
Placeholder (No Value)	3	3	3

**271 Charts—67% Complete:**

	<u>Month I</u>	<u>Month II</u>	<u>Month III</u>
Audit II Satisfied	256	256	256
Audit III Satisfied	1550	1319	874
In Progress	0	0	1
Not Started	452	683	1121

PMAP 4.0 Upgrade Impact – KPMG Consulting will monitor BellSouth's upgrade activities and will integrate the system upgrade into its replication test after the transition is completed. At this point, KPMG Consulting would review the reports from the last month when reports from PMAP Version 2.6 and PMAP Version 4.0 are run in parallel. If KPMG Consulting is satisfied that the reports are the same from Version 2.6 and Version 4.0, and if KPMG Consulting has successfully completed replication activity for all three months, KPMG Consulting would certify the SQM Reports and 271 Charts as satisfied. If KPMG Consulting has not completed replication activity for all three months when PMAP Version 4.0 is released and is satisfied with the parallel reports for the completed months, KPMG Consulting would complete its audit of the remaining SQM Reports and 271 Charts as they are produced from Version 4.0. If KPMG Consulting is not satisfied with the parallel report runs, KPMG Consulting will replicate an additional month for SQM Reports and 271 Charts that have previously been successfully replicated for all three months.

KPMG Consulting has acknowledged that if the parallel report runs from PMAP Version 2.6 and PMAP Version 4.0 produce the same report results, this would indicate that the Data Integrity (PMR4) and Replication (PMR5) testing for both Version 2.6 and Version 4.0 would result in the same conclusions.

**PMR 6: Statistical Analysis For SEEMS**

The Statistical Analysis test is scheduled to lag the PMR5 Test on replication. Analysis of the Statistical methodology is in progress and currently 15% complete.

PMAP 4.0 Upgrade Impact—The Statistical Analysis for SEEMS remains the same so the Version 4.0 upgrade will have no impact on this test.

**PMR 7: Enforcement Review of SEEMS**

The Enforcement Analysis calculates the SQM values using BellSouth raw data and compares the KPMG Consulting calculated values to the SQM values used for the Remedy payments. There are three (3) tiers of Metrics to be analyzed for three months.

This test is currently 15% complete.

The current status of the Enforcement Analysis is:

**Tier I (27 Metrics):**

	Month 1	Month 2	Month
3Matched	21	17	16
Non-Matched	4	0	0
In Progress	0	0	0
Not Started	2	10	11

**Tier II and Tier III Metrics have not been started.**

PMAP 4.0 Upgrade Impact—There will be minimal impact to this test with the Version 4.0 upgrade since the data for SEEMS calculations and data integrity is sourced from NODS in Version 2.6 and the 4.0 Warehouse in Version 4.0.

**REQUEST:** Describe BellSouth's policy on providing raw data for LSRs that are documented exclusions from performance measures. For example, LSRs classified as "projects" are documented exclusions from the Reject Interval and FOC Timeliness measures. BellSouth currently refuses to provide raw data for these "project" LSRs.

**RESPONSE:** BellSouth provides all the SQM Report Supporting Data used to calculate the results in each measure. Some data listed as an exclusion is currently "excluded" before the files are built for the calculation of the report. This is done to limit the size of the supporting data "raw data" files and to make the report run more efficiently. Actually the data is not "excluded" by the code, most of these items are not selected by the code for inclusion in the report. For instance a report statement might say "Select all N, T and C orders with a completion date during the report period". That would mean canceled orders would not be selected from the database for inclusion in the file used to calculate the report because it would not have a completion date.

However, based on requests from some CLECs who have the capability to manipulate exceedingly large files, BellSouth is developing the capability to produce supporting data files that include all data used in the report or excluded from the report by the SQMP that exists in the PMAP Warehouse. BellSouth will furnish to a requesting CLEC three months each year the SQMP Supporting Data Files and files with the data listed in the Exclusion Section of that state's SQMP. This will include "projects" which are large complex requests and are assigned to project managers by the CLEC and BellSouth who negotiate FOC and provisioning intervals. Projects are excluded from the Ordering Measures but are included in the Provisioning Measures.

**REQUEST:** Describe any differences in the data included in the LSRs in the denominator of the % Rejected LSRs measure (Total Mechanized) and the number of LSRs included in the "Total Mech LSRs" in the flow-through report.

**RESPONSE:** Flow-Through "Total Mech LSRs" includes projects, PMAP % Rejected LSRs does not.

Flow-Through "Total Mech LSRs" includes LSRs with negative FOC or reject intervals, % Rejected LSRs does not.

Flow-Through "Total Mech LSRs" includes LSRs where a product code could not be identified, PMAP % Rejected LSRs does not.

Flow-Through "Total Mech LSRs" includes LSRs for which a state was not identified, % Rejected LSRs does not.



**REQUEST:** Describe any differences in the data included in the LSRs in the denominator of the LNP % Rejected LSRs measure (Total Mechanized) and the number of LSRs included in the "Total Mech LSRs" in the LNP flow-through report.

**RESPONSE:** LNP Flow-Through 'Total Mech LSRs' includes all LSRs that meet the following conditions:

- 1.) Received by the LNP Gateway in the reporting month
- 2.) Received a Clarification or FOC by the time the snapshot of the data is taken.

LNP % Rejected LSRs includes LSRs received by TAG or EDI gateways in the reporting month.

LNP Flow-Through 'Total Mech LSRs' includes LSRs with negative intervals, LNP % Rejected LSRs excludes LSRs with negative intervals.

LNP Flow-Through 'Total Mech LSRs' includes LSRs with a SUP of 01 (cancel). LNP % Rejected LSRs excludes LSRs with a SUP of 01.

LNP Flow-Through 'Total Mech LSRs' includes projects, LNP % Rejected LSRs excludes projects.

**REQUEST:** Describe any differences in the data included in the LSRs in the fully mechanized Reject Interval measure and the LSRs in the auto-clarifications of the flow-through report.

**RESPONSE:** Flow-Through Auto-clarifications includes projects, PMAP fully mechanized Reject Interval does not.

Flow-Through Auto-clarifications includes LSRs with negative reject intervals, fully mechanized Reject Interval does not.

Flow-Through Auto-clarifications includes LSRs for which a product code could not be identified, PMAP fully mechanized Reject Interval does not.

Flow-Through Auto-clarifications includes LSRs that were auto-clarified in error and then corrected by a service representative, PMAP fully mechanized Reject Interval does not.

Flow-Through Auto-clarifications does not include any LSRs that were clarified by a service representative, PMAP fully mechanized Reject Interval includes LSRs that were clarified by a service representative, but were not properly assigned to a specific service representative.

Flow-Through Auto-clarifications does not include any LSRs that went to planned manual fallout, PMAP fully mechanized Reject Interval includes LSRs that went to planned manual fallout and were clarified by a service representative, but were not properly assigned to a specific service representative.

Flow-Through Auto-clarifications excludes LSRs received in previous months, fully mechanized Reject Interval does not.

Flow-Through Auto-clarifications includes LSRs for which a state could not be identified, fully mechanized Reject Interval does not.

REQUEST: Describe any differences in the data included in the LSRs in the fully mechanized LNP Reject Interval measure and the LSRs in the auto-clarifications of the LNP flow-through report.

RESPONSE: LNP Flow-Through Auto-clarifications excludes LSRs received in previous months. Fully mechanized LNP Reject Interval includes LSRs received in previous months and rejected in the current month.

LNP Flow-Through Auto-clarifications include LSRs with negative intervals. Fully mechanized LNP Reject Interval excludes LSRs with negative intervals.

LNP Flow-Through Auto-clarifications includes LSRs with a SUP of 01 (cancel). Fully mechanized LNP Reject Interval excludes LSRs with a SUP of 01.

LNP Flow-Through Auto-clarifications includes projects. Fully mechanized LNP Reject Interval excludes projects.

LNP Flow-Through Auto-clarifications counts LSRs which meet the following criteria from tables in the LNP Gateway: tranacktype = AH, errorlevel = AUTO and errorsources = A. Fully mechanized LNP Reject Interval counts LSRs which meet the following criteria from EDI or TAG logs: tran\_set\_pur\_cd = 'CLARIFICATION' and cuid = unassign. These differences in logic have resulted in the following differences in the counts of LSRs:

- 1.) LNP Flow-Through Auto-clarifications contains some LSRs which may have been clarified by a Service Representative.
- 2.) LNP Flow-Through Auto-clarifications contains some LSRs that fell for Planned Manual handling.

These issues will not impact the reported Percent Flow-Through results.

REQUEST: Describe any differences in the data included in the LSRs in the partially mechanized Reject Interval measure and the LSRs included in the "CLEC caused fallout" of the flow-through report.

RESPONSE: Flow-Through "CLEC-Caused fallout" includes projects, PMAP Reject Interval does not.

Flow-Through "CLEC-Caused fallout" includes LSRs with negative reject intervals, Reject Interval does not.

Flow-Through "CLEC-Caused fallout" includes LSRs for which a product code could not be identified, PMAP Reject Interval does not.

Flow-Through "CLEC-Caused fallout" includes LSRs that are dropped to the LCSC via the "TSIGNOUT" queue, PMAP Reject Interval also includes TSIGNOUT LSRs, but only those that are assigned to a specific service representative.

Flow-Through "CLEC-Caused fallout" excludes LSRs that were auto-clarified, Reject Interval includes LSRs that are auto-clarified if they are subsequently routed to a service representative for handling.

Flow-Through "CLEC-Caused fallout" excludes LSRs that went to planned manual fallout, PMAP Reject Interval does not.

Flow-Through "CLEC-Caused fallout" excludes LSRs received in previous months, Reject Interval does not.

Flow-Through "CLEC-Caused fallout" includes LSRs for which a state could not be identified, Reject Interval does not.

**REQUEST:** Describe any differences in the data included in the LSRs in the partially mechanized LNP Reject Interval measure and the LSRs included in the "CLEC caused fallout" of the LNP flow-through report.

**RESPONSE:** LNP CLEC-Caused Fallout excludes LSRs received in previous months. Partially mechanized LNP Reject Interval includes LSRs received in previous months.

LNP CLEC-Caused Fallout includes LSRs with negative intervals. Partially mechanized LNP Reject Interval excludes LSRs with negative intervals.

LNP CLEC-Caused Fallout includes LSRs with a SUP of 01 (cancel). Partially mechanized LNP Reject Interval excludes LSRs with a SUP of 01.

LNP CLEC-Caused Fallout includes projects. Partially mechanized LNP Reject Interval excludes projects.

LNP CLEC-Caused Fallout excludes LSRs that fell out for Planned Manual handling. Partially mechanized LNP Reject Interval includes LSRs that fell out for Planned Manual handling.

LNP CLEC-Caused Fallout includes LSRs where the tranacktype = AH and the LSR was not assigned to Auto-clarifications or Planned Manual. Partially mechanized LNP Reject Interval includes LSRs that were clarified in the EDI/TAG gateway and the cuid <> unassign. The tranacktype does not have to be AH.

This difference in logic can cause the following difference in LSR counts:

1.) If an LSR gets both a clarification and a FOC (the LSR is clarified in error and the Service Representative fixes it), the LNP Gateway keeps only the last response type which is the FOC, and the cuid will not be "unassign", so the LSR will not be counted in CLEC Caused fallout, but in BellSouth Caused fallout. The LSR will be counted in Partially mechanized LNP Reject Interval because it gets the clarification indicator from the EDI / TAG gateway which keeps all responses.

**REQUEST:** Describe any differences in the data included in the LSRs in the fully mechanized FOC timeliness measure and the LSRs included in the "Issued Service Orders" of the flow-through report.

**RESPONSE:** Flow-Through "Issued Service Orders" includes projects, PMAP fully mechanized FOC Timeliness does not.  
Flow-Through "Issued Service Orders" includes LSRs with negative FOC intervals, fully mechanized FOC Timeliness does not.  
Flow-Through "Issued Service Orders" includes LSRs for which a product code could not be identified, PMAP fully mechanized FOC Timeliness does not.

Flow-Through "Issued Service Orders" includes LSRs that were FOC'd and the service order number is properly recorded in LEO. PMAP fully mechanized FOC Timeliness includes all LSRs that were FOC'd whether or not the service order number is properly recorded in LEO.

Flow-Through "Issued Service Orders" includes LSRs that were "Dummy FOC'd" ('%DUMMY FOC SENT%'), while PMAP fully mechanized FOC Timeliness includes slightly fewer LSRs that were "Dummy FOC'd" ('%DUMMY FOC SENT').

Flow-Through "Issued Service Orders" excludes FOC'd LSRs that drop to the LCSC via the "TSIGNOUT" queue as well as LSRs classified as "Planned Manual Fallout" via the SQM. PMAP fully mechanized FOC Timeliness includes those FOC'd TSIGNOUT and "Planned Manual Fallout" LSRs that are not assigned to a specific service representative.

Flow-Through "Issued Service Orders" excludes LSRs received in previous months, PMAP fully mechanized FOC Timeliness does not.

Flow-Through "Issued Service Orders" includes LSRs for which a state was not identified, fully mechanized FOC Timeliness does not.

**REQUEST:** Describe any differences in the data included in the LSRs in the fully mechanized LNP FOC timeliness measure and the LSRs included in the "Issued Service Orders" of the LNP flow-through report.

**RESPONSE:** RESPONSE: LNP "Issued Service Orders" excludes LSRs received in previous months. Fully mechanized LNP FOC Timeliness includes LSRs received in previous months and FOC'd in the current month.

LNP "Issued Service Orders" includes LSRs with negative intervals. Fully mechanized LNP FOC Timeliness excludes LSRs with negative intervals.

LNP "Issued Service Orders" includes LSRs with a SUP of 01 (cancel). Fully mechanized LNP FOC Timeliness excludes LSRs with a SUP of 01.

LNP "Issued Service Orders" includes projects. Fully mechanized LNP FOC Timeliness excludes projects.

LNP "Issued Service Orders" includes LSRs that were not classified as Auto-clarification or Planned Manual, and met one of the following conditions:

1.) REQTYPE = CB

- a. FOC was transmitted in response to LSR
- b. The trigger service order associated with the LSR was generated mechanically.

2.) REQTYPE = BB

- a. FOC was transmitted in response to LSR
- b. All service orders associated with the LSR were generated mechanically.

3.) CUID = unassign

Fully mechanized LNP FOC Timeliness includes LSRs where cuid = unassign and either:

- 1.) Tranacktype <> RD and there is no EDI / TAG gateway timestamp
- 2.) FOC was sent at the EDI / TAG gateway.

These differences in logic can result in the following differences in LSR counts:

- 1.) If the disconnect order for a REQTYPE CB LSR was generated manually, the LSR would be counted in LNP Flow-Through Issued SOs, but not in the Fully mechanized FOC Timeliness measure.
- 2.) If the Tranacktype value was AH, indicating a clarification, and there was not an inbound timestamp or a outbound FOC timestamp in the EDI / TAG gateway, the LSR would be counted as both a fully mechanized reject and a fully mechanized FOC.



## O-4: Percent Flow-Through Service Requests (Detail)

### Definition

A detailed list, by CLEC, of the percentage of Local Service Requests (LSR) and LNP Local Service Requests (LNP LSRs) submitted electronically via the CLEC mechanized ordering process that flow through and reach a status for a FOC to be issued, without manual or human intervention.

### Exclusions

- Fatal Rejects
- Auto Clarification
- Manual Fallout
- CLEC System Fallout
- Scheduled OSS Maintenance

### Business Rules

The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) which are submitted through one of the three gateway interfaces (TAG, EDI, and LENS), that flow through and reach a status for a FOC to be issued, without manual intervention. These LSRs can be divided into two classes of service: Business and Residence, and three types of service: Resale, and Unbundled Network Elements (UNE). The CLEC mechanized ordering process does not include LSRs, which are submitted manually (for example, fax and courier) or are not designed to flow through (for example, Manual Fallout.)

#### Definitions:

**Fatal Rejects:** Errors that prevent an LSR, submitted electronically by the CLEC, from being processed further. When an LSR is submitted by a CLEC, LEO/LNP Gateway will perform edit checks to ensure the data received is correctly formatted and complete. For example, if the PON field contains an invalid character, LEO/LNP Gateway will reject the LSR and the CLEC will receive a Fatal Reject.

**Auto-Clarification:** Clarifications that occur due to invalid data within the LSR. LESOG/LAUTO will perform data validity checks to ensure the data within the LSR is correct and valid. For example, if the address on the LSR is not valid according to RSAG, or if the LNP is not available for the NPA NXXX requested, the CLEC will receive an Auto-Clarification.

**Manual Fallout:** Planned Fallout that occur by design. Certain LSRs are designed to fallout of the Mechanized Order Process due to their complexity. These LSRs are manually processed by the LCSC. When a CLEC submits an LSR, LESOG/LAUTO will determine if the LSR should be forwarded to LCSC for manual handling. Following are the categories for Manual Fallout:

- |   |  |
|---|--|
| 1. Complex*   | 8. Denials-restore and conversion, or disconnect and conversion orders   |
| 2. Special pricing plans  | 9. Class of service invalid in certain states with some types of service |
| 3. Some Partial migrations                                      | 10. Low volume such as activity type "T" (move)                          |
| 4. New telephone number not yet posted to BOCRIS                | 11. More than 25 business lines, or more than 15 loops                   |
| 5. Pending order review required                                | 12. Transfer of calls option for the CLEC end users                      |
| 6. CSR inaccuracies such as invalid or missing CSR data in CRIS | 13. Directory Listings (Indentations and Captions)                       |
| 7. Expedites (requested by the CLEC)                            |  |

\*See LSR Flow-Through Matrix following O-6 for a list of services, including complex services, and whether LSRs issued for the services are eligible to flow through.

**Total System Fallout:** Errors that require manual review by the LCSC to determine if the error is caused by the CLEC, or is due to BellSouth system functionality. If it is determined the error is caused by the CLEC, the LSR will be sent back to the CLEC for clarification. If it is determined the error is BellSouth caused, the LCSC representative will correct the error, and the LSR will continue to be processed.

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May 23, 2002

**DELIVERED BY HAND**

Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, Georgia 30334-5701

Re: *Investigation Into Development of Electronic Interfaces for BellSouth's  
Operations Support Systems*; Docket 8354-U

*Performance Measurements for Telecommunications Interconnection,  
Unbundling and Resale*; Docket No. 7892-U

Dear Mr. McAlister:

Consistent with the Report filed by BellSouth Telecommunications, Inc. ("BellSouth") on March 22, 2002, BellSouth is completing the process of upgrading to Version 4.0 of its Performance Measurement and Analysis Platform ("PMAP"). In connection with that upgrade, BellSouth is planning to implement certain changes to the method of calculating its performance measurement results. These changes are intended to ensure consistency with the Service Quality Measurement ("SQM") Plan, to address certain data issues previously identified, and to resolve concerns raised by KPMG Consulting, Inc. These changes are described in detail in the enclosed Notification Report, which includes a description of each change, the reason for the change, and an estimate of the impact of the change, if available.

In the Reply Comments filed by the Commission on March 28, 2002 in CC Docket No. 02-35, the Commission Staff indicated that it would include in its recommendation in Docket 7892-U "a requirement that would obligate BellSouth to provide written notice of any proposed changes to the method of calculating any performance measurement prior to such changes being implemented." BellSouth will comply with whatever notification process the Commission ultimately adopts. In the meantime, however, BellSouth is filing the enclosed Notification Report to provide the Commission and interested parties with prior notice of the changes being made.

Docket 97-00309  
Exhibit KCT-13

Mr. Reece McAlister  
May 23, 2002  
Page 2

Enclosed please find an original and eighteen (18) copies, as well as an electronic version, of BellSouth's Notification Report, and I would appreciate your filing same and returning the three (3) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your assistance in this regard.

Yours very truly



Bennett L. Ross

BLR:nvd  
Enclosures

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)  
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## **APRIL DATA NOTIFICATION**

As part of the upgrade to Version 4.0 of BellSouth's Performance Measurement and Analysis Platform ("PMAP"), which is used to generate the performance reports filed with the Commission, BellSouth will be implementing certain changes to the method of calculating its performance measurement results. These changes, described below, will be included in PMAP Version 4.0, which will be used to generate results for the April data month, which are scheduled to be posted on May 31, 2002. BellSouth provides this notice to the CLECs and the Commission pursuant to the state commissions' desire that BellSouth provide written notice of any proposed changes to the method of calculating any performance measurement prior to such changes being implemented. At such time as a state commission implements a formal notification process, BellSouth will comply with that process. All impacts are stated at the measurement, as opposed to sub-metric level unless otherwise stated.

### **ORDERING MEASUREMENTS:**

- In previous months, a discrepancy in Reject Interval and Firm Order Confirmation ("FOC") Timeliness performance was caused by the fact that some of BellSouth's systems are on Eastern Time, and some are on Central Time, and that the normalized OSS downtime exclusion had not been implemented for xDSL orders. As a result, BellSouth's performance was being understated. With April 2002 data, BellSouth is fixing both of these issues, which should increase reported performance by 1-3% for Reject Interval and a negligible amount for FOC Timeliness.
- When a CLEC sends a large volume of nearly identical orders via fax to the Local Carrier Service Center ("LCSC"), the service representative may bulk load those orders via LENS. As a result these non-mechanized orders were being reflected as mechanized orders, which caused performance to be understated slightly. With April data, BellSouth will correctly identify the bulk-loaded orders as non-mechanized, which should improve performance by less than 0.5%.
- BellSouth has discovered that certain Records not associated with any CLEC are being improperly included in the CLEC-aggregate results for the ordering measures, even though the Records are not reflected in the CLEC-specific results. With April data, BellSouth will exclude Records that are not associated with any CLEC from the aggregated performance results, which should affect the ordering measures by less than 0.5%.
- BellSouth will implement more specific product identification to assign data to the Line Sharing, and Combo Other categories. In particular, improved product mapping to reflect more types of EELs in the Combo Other category will be implemented. Because of the relatively low historical volumes for these products,

the total relevant impacts with respect to the measures are not quantifiable at this time, will impact all ordering measures for these products.

- The method for identifying whether a FOC or Reject was returned on xDSL orders was changed. The changed coding has uncovered a potential problem with the source data that is still being investigated.

### **PROVISIONING MEASUREMENTS:**

- The LNP measure Percentage of Time BellSouth Applies the 10-digit Trigger will be modified to include orders written in the prior month when the port is to be done in the current month rather than just reporting volumes in the month wherein the order is received. In addition, BellSouth will implement enhanced coding that will better identify trigger-eligible orders and whether the trigger was properly applied. The aggregate measurement results will be reduced by about 1% as a result of these changes.
- For the Provisioning Troubles in X Days measure, some troubles associated with service orders that contain multiple circuits were not being reflected. BellSouth is implementing a more accurate counting of troubles on orders containing multiple circuits, which is expected to create less than a 1% difference in the overall measurement results.
- Prior to April data, orders that were completed in one month, but the completion notice was sent in another month after the measurement processing window closed were not included in the data. Similarly, where a jeopardy notice occurs in a different month from the due date, the order was not included in the data. Such order will be included effective with April data. These CLEC requested changes will have a minimal impact on results.
- Additional criteria will be utilized to more accurately identify stand-alone LNP orders. Consequently, a small volume of LNP orders that were defaulting to an error bucket will now be captured in the stand-alone LNP product. This change is expected to create a less than 1% increase in the LNP stand-alone base with a minimal impact on measurement results.
- BellSouth will implement more specific product identification to assign data to the Line Sharing, and Combo Other categories. In particular, improved product mapping to reflect more types of EELs in the Combo Other category will be implemented. Because of the relatively low historical volumes for these products, the total relevant impacts with respect to the measures are not quantifiable at this time, although this change will impact all provisioning measures for these products.



- Improved methods will be implemented to assign CLEC resale and retail order volume for ISDN, Centrex, Residential, Business, ADSL, Coin, and PBX lines to SQM categories. The retail order volume in these categories will be affected by less than 2% with a minimal impact on results for the overall measure.

#### **MAINTENANCE AND REPAIR MEASUREMENTS:**

- Some trouble tickets that were formerly defaulting to an error bucket because they could not be associated with a wire center can now be properly associated with a wire center and included in the measures. This change will increase the combined volume of CLEC and retail trouble tickets by less than 1% across the region.
- With April data, there will be an improved means to identify and exclude trouble tickets associated with reports on official BellSouth lines, consistent with the SQM. This change will reduce the retail analog ticket base by less than 0.1% resulting in a minimal impact on measurement results.
- Prior to April data a small number of trouble tickets for a subset of CLEC and retail ISDN products were previously reflected in the Other Design category due to inability of the product mapping routines to properly identify them and assign them to the correct disaggregation for the retail analog. With April data, BellSouth will implement an improved ability to map products to SQM product categories, which will affect less than 1% of the retail and CLEC trouble tickets in the region.
- In the WFA system, the following sequence of events does not result in a repeat trouble being counted when a repeat trouble. That sequence is an actual trouble, followed by a CPE or information trouble ticket, which are excludable trouble tickets for per the SQM, followed by another actual trouble, which was erroneously being excluded from the measure. All three of these trouble tickets would have to arise within the same 30-day period for this issue to arise. Both the retail analogue and CLEC data are understated by less than 0.5%.
- Improved methods will be implemented to assign CLEC resale and retail trouble tickets and lines in service for ISDN, Centrex, Residential, Business, ADSL, Coin, and PBX to SQM product categories. This change will affect the number of trouble tickets and lines in service in these categories by less than 1%.
- With the production of April data, existing circuits with pending service order changes on them will now be reflected in the number of lines in service. Overall, the denominator for Trouble Report Rate metrics will increase by less than 2%, which will slightly improve both retail and wholesale reported performance.

**OTHER MEASUREMENTS:**

- To address Florida Observation 180, BellSouth will make changes to the methodology for service order volumes for the SQM measurement, "Database Update Information: Percent Database Update Accuracy", effective with April data. Currently, the sample of service orders pulled is a subset of "correct" service orders from the Service Order Accuracy measure. Consequently, service orders that were identified as having an error on any part of the order in the service order accuracy review were excluded from the sample for the Database Update Accuracy measure. The error could have been irrelevant to database updates because a large number of fields are checked under the service order accuracy measure. Effective with March completed service orders (April data), BellSouth will include all orders that affect DA, LIDB, or DL on the list of orders to be reviewed regardless of whether or not there is an error on another part of the service order. This issue will have a minimal impact to the data because the service order accuracy rate is so high. In fact, for April data, this change had no impact on reported results
- Consistent with the SQM, BellSouth will implement a coding change to exclude billing associated with KPMG test bed records. This will have a negligible affect on the billing measures.
- Data for end users located in one state and served from a wire center in another state will now be reported in the state where the end user is located. Previously, the data was reported in the state where the wire center was located. This change is consistent with the way that state commissions typically desires to reflect these cross boundary situations. This change will appear as revised data for the states. The largest revisions will appear in Georgia, Tennessee, South Carolina, Alabama, and Mississippi. This will affect both maintenance and provisioning measures.

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June 4, 2002

**DELIVERED BY HAND**

Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, Georgia 30334-5701

Re: *Investigation Into Development of Electronic Interfaces for BellSouth's  
Operations Support Systems; Docket 8354-U*

*Performance Measurements for Telecommunications Interconnection,  
Unbundling and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

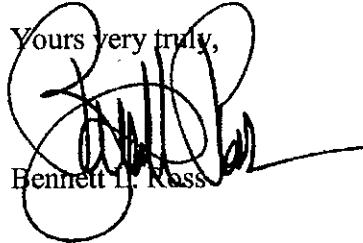
As noted in my letter of May 23, 2002, as part of the upgrade to Version 4.0 of its Performance Measurement and Analysis Platform ("PMAP"), BellSouth Telecommunications, Inc. ("BellSouth") is implementing certain changes to the method of calculating its performance measurement results. These changes were described in detail in the Notification Report filed with the Commission on May 23, 2002.

With the upgrade nearly complete and with April performance data expected to be posted on June 5, 2002 using the Version 4.0 platform, BellSouth has identified additional changes that are being made in the calculation of its performance results. These additional changes are outlined in the revised Notification Report, including a description of each change, the reason for the change, and an estimate of the impact of the change, if available.

Enclosed please find an original and eighteen (18) copies, as well as an electronic version, of BellSouth's revised Notification Report, and I would appreciate your filing same and returning the three (3) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Mr. Reece McAlister  
June 4, 2002  
Page 2

Thank you for your assistance in this regard.

Yours very truly,  
  
Bennett L. Rass

BLR:nvd  
Enclosures

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)  
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**PARTIES OF RECORD**  
**Docket No. 8354-U and 7892-U**

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## **REVISED APRIL DATA NOTIFICATION**

As part of the upgrade to Version 4.0 of BellSouth's Performance Measurement and Analysis Platform ("PMAP"), which is used to generate the performance reports filed with the Commission, BellSouth will be implementing certain changes to the method of calculating its performance measurement results. These changes, described below, will be included in PMAP Version 4.0, which will be used to generate results for the April data month, which will be posted on June 5, 2002. BellSouth provides this notice to the CLECs and the Commission pursuant to the state commissions' desire that BellSouth provide written notice of any proposed changes to the method of calculating any performance measurement prior to such changes being implemented. At such time as a state commission implements a formal notification process, BellSouth will comply with that process. All impacts are stated at the measurement, as opposed to sub-metric level unless otherwise stated.

### **ORDERING MEASUREMENTS:**

- In previous months, a discrepancy in Reject Interval and Firm Order Confirmation ("FOC") Timeliness performance was caused by the fact that some of BellSouth's systems are on Eastern Time, and some are on Central Time, and that the normalized OSS downtime exclusion had not been implemented for xDSL orders. As a result, BellSouth's performance was being understated. In response to exception to FL exception 36, Partially Mechanized orders that are both received and responded to during LCSC off hours will show a response time of 1 minute instead of 0. With April 2002 data, BellSouth is fixing both of these issues, which should increase reported performance by 1-3% for Reject Interval and a negligible amount for FOC Timeliness.
- When a CLEC sends a large volume of nearly identical orders via fax to the Local Carrier Service Center ("LCSC"), the service representative may bulk load those orders via LENS. As a result these non-mechanized orders were being reflected as mechanized orders, which caused performance to be understated slightly. With April data, BellSouth will correctly identify the bulk-loaded orders as non-mechanized, which should improve performance by less than 0.5%.
- BellSouth has discovered that certain Records not associated with any CLEC are being improperly included in the CLEC-aggregate results for the ordering measures, even though the Records are not reflected in the CLEC-specific results. With April data, BellSouth will exclude Records that are not associated with any CLEC from the aggregated performance results, which should affect the ordering measures by less than 0.5%. Additionally, BellSouth has discovered that certain data produced via Barney which are LNP and xDSL partially mechanized orders submitted by CLECs with Company Codes beginning with a leading "0" were being excluded from the results. With the implementation of April data, these records will be included in the ordering results.



- BellSouth will implement more specific product identification to assign data to the Line Sharing, Other Non-Design, XDSL, and Combo Other categories. In particular, improved product mapping to reflect more types of EELs in the Combo Other category will be implemented. These changes will address FL exception 114/120. Because of the relatively low historical volumes for these products, the total relevant impacts with respect to the measures are not quantifiable at this time, will impact all ordering measures for these products.
- The method for identifying whether a FOC or Reject was returned on xDSL orders was changed which affected the FOC/Reject Completeness measure. The changed coding has uncovered a potential problem with the source data that is still being investigated.
- The methodology used to identify Rejected Service Orders was revised. The revised method uncovered an error in the source system feed that will now result in about 2% fewer rejects being identified until the source data is corrected. This issue, which arose with April data, will affect Resale, UNE Loop without LNP, and Loop/Port Combo categories.

#### **PROVISIONING MEASUREMENTS:**

- The LNP measure Percentage of Time BellSouth Applies the 10-digit Trigger will be modified to include orders written in the prior month when the port is to be done in the current month rather than just reporting volumes in the month wherein the order is received. In addition, BellSouth will implement enhanced coding that will better identify trigger-eligible orders and whether the trigger was properly applied. The aggregate measurement results will be reduced by about 1% as a result of these changes.
- For the Provisioning Troubles in X Days measure, some troubles associated with service orders that contain multiple circuits were not being reflected. BellSouth is implementing a more accurate counting of troubles on orders containing multiple circuits.. Additionally with this change, BellSouth will be correcting a scenario where a single trouble ticket was being associated with multiple service orders during the reporting period and BellSouth will be implementing a change to the measure involving a coding change to improve trouble ticket association with completed service orders. These changes are expected to create less than a 1% difference in the overall measurement results.
- Prior to April data, orders that were completed in one month, but the completion notice was sent in another month after the measurement processing window closed were not included in the data. Similarly, where a jeopardy notice occurs in a different month from the due date, the order was not included in the data. Such order will be included effective with April data. These CLEC requested changes will have a minimal impact on results.

- Additional criteria will be utilized to more accurately identify stand-alone LNP orders. Consequently, a small volume of LNP orders that were defaulting to an error bucket will now be captured in the stand-alone LNP product. This change is expected to create a less than 1% increase in the LNP stand-alone base with a minimal impact on measurement results.
- BellSouth will implement more specific product identification to assign data to the Line Sharing, Other Non-Design, Other Design, XDSL, ISDN, Local Interconnection Trunks, and Combo Other categories. In particular, improved product mapping to reflect more types of EELs in the Combo Other category will be implemented. Because of the relatively low historical volumes for these products, the total relevant impacts with respect to the measures are not quantifiable at this time, although this change will impact all provisioning measures for these products.
- Improved methods will be implemented to assign CLEC resale and retail order volume for ISDN, Centrex, Residential, Business, ADSL, Coin, and PBX lines to SQM categories. The retail order volume in these categories will be affected by less than 2% with a minimal impact on results for the overall measure.
- In certain rare situations on both BellSouth retail and CLEC orders, SOCS may generate duplicate service order numbers in the same month. When this situation occurs, only the most recent service order was appearing in the measurement data. This problem was corrected and found to occur on only 0.1% to 0.5% of the CLEC and BellSouth retail orders and found to have minimal impact upon the measurement results.

#### **MAINTENANCE AND REPAIR MEASUREMENTS:**

- Some trouble tickets that were formerly defaulting to an error bucket because they could not be associated with a wire center can now be properly associated with a wire center and included in the measures. This change will increase the combined volume of CLEC and retail trouble tickets by less than 1% across the region.
- With April data, there will be an improved means to identify and exclude trouble tickets associated with reports on official BellSouth lines, consistent with the SQM. This change will reduce the retail analog ticket base by less than 0.1% resulting in a minimal impact on measurement results.
- Prior to April data a small number of trouble tickets for a subset of CLEC and retail ISDN products were previously reflected in the Other Design category due to inability of the product mapping routines to properly identify them and assign them to the correct disaggregation for the retail analog. With April data, BellSouth will implement an improved ability to map products to SQM product

categories, which will affect less than 1% of the retail and CLEC trouble tickets in the region.

- In the WFA system, the following sequence of events does not result in a repeat trouble being counted when a repeat trouble. That sequence is an actual trouble, followed by a CPE or information trouble ticket, which are excludable trouble tickets for per the SQM, followed by another actual trouble, which was erroneously being excluded from the measure. All three of these trouble tickets would have to arise within the same 30-day period for this issue to arise. Both the retail analogue and CLEC data are understated by less than 0.5%.
- Improved methods will be implemented to assign CLEC resale and retail trouble tickets and lines in service for ISDN, Centrex, Residential, Business, ADSL, Coin, Other Non-Design, Other Design, and PBX to SQM product categories. This change will affect the number of trouble tickets and lines in service in these categories by less than 1%.
- With the production of April data, existing circuits with pending service order changes on them will now be reflected in the number of lines in service. Overall, the denominator for Trouble Report Rate metrics will increase by less than 2%, which will slightly improve both retail and wholesale reported performance.
- With the production of April data, BellSouth will implement a correction to the coding for measures in which BellSouth DSL is the retail analogue to exclude ADSL lines that do not have BellSouth as the designated Internet Service Provider. This correction will reduce the line counts for the BellSouth analogue for the Customer Trouble Report Rate measure. This measurement result is impacted by about 0.1%.

#### **OTHER MEASUREMENTS:**

- To address Florida Observation 180, BellSouth will make changes to the methodology for service order volumes for the SQM measurement, "Database Update Information: Percent Database Update Accuracy", effective with April data. Currently, the sample of service orders pulled is a subset of "correct" service orders from the Service Order Accuracy measure. Consequently, service orders that were identified as having an error on any part of the order in the service order accuracy review were excluded from the sample for the Database Update Accuracy measure. The error could have been irrelevant to database updates because a large number of fields are checked under the service order accuracy measure. Effective with March completed service orders (April data), BellSouth will include all orders that affect DA, LIDB, or DL on the list of orders to be reviewed regardless of whether or not there is an error on another part of the service order. This issue will have a minimal impact to the data because the

service order accuracy rate is so high. In fact, for April data, this change had no impact on reported results

- Consistent with the SQM, BellSouth will implement a coding change to exclude billing associated with KPMG test bed records. This will have a negligible affect on the billing measures.
- Data for end users located in one state and served from a wire center in another state will now be reported in the state where the end user is located. Previously, the data was reported in the state where the wire center was located. This change is consistent with the way that state commissions typically desires to reflect these cross boundary situations. This change will appear as revised data for the states. The largest revisions will appear in Georgia, Tennessee, South Carolina, Alabama, and Mississippi. This will affect both maintenance and provisioning measures.
- There was a coding error that incorrectly included certain records such as official trunks or trunks when the owner cannot be identified in the Retail data for Trunk Group Performance. This was corrected with the April release.

# SMITH, GALLOWAY, LYNDALL & FUCHS, LLP

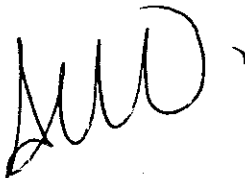
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PHILIP J. SMITH  
NEWTON M. GALLOWAY  
TERRI M. LYNDALL  
DEAN R. FUCHS

HAND DELIVERED

June 12, 2002



Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, First Floor  
Atlanta, Georgia 30334

JUL 12 2002  
RECEIVED  
FBI - ATLANTA

Re: Docket 7892-U: Emergency Motion of the Southeastern Competitive Carriers Association to Establish a Procedure for Implementation of Changes to the Service Quality Measures

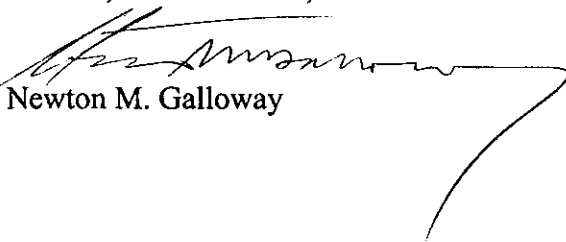
Dear Mr. McAlister:

You will please find included herewith for filing an original and sixteen (16) copies of the Southeastern Competitive Carriers Association's Emergency Motion to Establish a Procedure for Implementation of Changes to the Service Quality Measures pertinent to the above-referenced matter. I have enclosed a 3.5" diskette containing the filings in Microsoft Word format. Please file stamp one duplicate of the filing and return it to me in the envelope provided.

I appreciate your cooperation and assistance in this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,

SMITH, GALLOWAY, LYNDALL & FUCHS, LLP

  
Newton M. Galloway

NMG/alf  
Enclosures

cc: All Parties of Record  
Southeastern Competitive Carriers Association

Docket 97-00309  
Exhibit KCT-14

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

Performance Measurements for :  
Telecommunications Interconnection, Docket No. 7892-U  
Unbundling and Resale :

EMERGENCY MOTION OF THE SOUTHEASTERN COMPETITIVE  
CARRIERS ASSOCIATION TO ESTABLISH A PROCEDURE FOR  
IMPLEMENTATION OF CHANGES TO THE SERVICE QUALITY  
MEASURES

Comes now, the Southeastern Competitive Carriers Association (SECCA)<sup>1</sup>, and pursuant to Rule 515-2-1.04 files this Emergency Motion requesting that this Commission immediately establish a procedure for implementation of changes to BellSouth's performance measurement calculations. In addition, SECCA requests that this Commission require BellSouth to participate in an industry call to explain the changes outlined in the May 23 and June 4 filings and comply, as to those filings, with the procedures established by this Commission for implementing performance measurement calculation changes.

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<sup>1</sup> Access Integrated Networks, Inc., Actel Integrated Communications, Inc., ASCENT, AT&T Communications of the Southern States, L.L.C., Birch Telecom Inc, Business Telecom, Inc., COMPTel, ConnectSouth Communications, Inc., e.spire Communications, KMC Telecom, ICG Communications, ITC^DeltaCom, Inc., WorldCom, Inc., NewSouth Communications, Qwest Communications, Rhythms Links Inc., Time Warner Telecom, TriVergent Communications, US LEC Corp., XO Communications).

BellSouth implemented no less than *twenty-four (24) changes* which impact the performance measurement data provided to CLECs and the Commission without an opportunity for CLEC comment and approval by this Commission. On May 23 and June 4, BellSouth filed "notices" with this Commission that certain changes were being made to the performance measurement calculations as a result of updates to the Performance Measurement Analysis Platform ("PMAP"). However, there are several problems with the "notices" that require this Commission to immediately implement procedures to prevent these and any further unauthorized changes.

In reality, the "notices" were not advance notices. BellSouth, in the filings, indicated that the changes would be "used to generate results for the April data month" (May 23, 2002 filing, page 1 of 4). However, BellSouth had already posted the preliminary April data on May 21<sup>st</sup> - two days prior to the notice. Obviously, any programming changes had to be made well in advance of this "notice" to allow BellSouth to post the preliminary data. Nor did the "notices" provide detailed information that would allow CLECs the opportunity to determine the impact of the changes and make any necessary comments prior to their implementation. For instance, BellSouth indicated that there would be "more specific production identification to assign data to the Line Sharing, and Combo other categories. In

particular, improved product mapping to reflect more types of EELS in the Combo Other category will be implemented" (May 23, 2002 filing, page 1 of 4).-- Yet, the filing does not indicate what types of EELS are still not included in the UNE Combo category. It is also unclear what changes are being made to line sharing.

Another example is BellSouth's unilateral change for "identifying whether a FOC or Reject was returned on xDSL orders" (May 23, 2002 filing, p. 2 of 4). BellSouth does not identify the coding change, the problem that caused the change or the "new" method being used to identify FOCs and rejects. BellSouth has also determined that "improved methods will be implemented to assign CLEC resale and trouble tickets and lines" to various product categories (May 23, 2002 filing, page 3 of 4). That "improved method" is not specifically delineated in the May 23 or June 4 filings. These are just a few examples which show that without sufficient information detailing the changes that have already been implemented, CLECs cannot determine the impact on the performance measurement calculations and whether the changes are reasonable and necessary.

Finally, BellSouth failed to obtain Commission approval prior to implementing these changes. As this Commission is fully aware, one of the major issues discussed during the recent performance workshops was the discrepancy between the SQM



approved by this Commission and how BellSouth calculated the performance measures. BellSouth's changes to the calculations as specified in the SQM were based upon its own interpretations, which were, in turn, often inexplicable as well as opposed to what the Commission previously ordered. There is an open docket that allows BellSouth the opportunity to seek Commission approval prior to making such changes. Yet, despite the serious concerns raised during the workshops about this exact issue, BellSouth implemented unauthorized, unilateral changes to the performance measurement calculations.

This Commission filed Reply Comments with the Federal Communications Commission ("FCC") stating that such action by BellSouth will not be tolerated.

The Commission agrees with the DOJ that changes to the performance measurement calculations should be made only with public notice and concurrence of this Commission... and that the PSC will include a requirement that would obligate BellSouth to provide written notice of any proposed changes to the method of calculating any performance measurement prior to such changes being implemented. This notice should include, at a minimum, a description of the proposed changes as well as the reason for the change, which would give interested parties the opportunity to comment on any proposed change before that change.<sup>2</sup>

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<sup>2</sup> Georgia Public Service Commission Reply Comments, *In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services In Georgia and Louisiana*. CC Docket No. 02-35, March 28, 2002: p. 8.

In addition, the Commission also indicated that "Staff will recommend that BellSouth be penalized for changing the Service Order Accuracy SQM without prior Commission approval."<sup>3</sup> Thus, this Commission agrees that BellSouth should not be allowed to make unilateral changes to performance measurement calculations without:

- a. prior detailed notice of the changes;
- b. opportunity for comment; and
- c. Commission approval of the changes.

The Commission should also ensure that CLECs have access to the metrics change management tracking database BellSouth uses as well as the opportunity to participate in change control meetings which are part of BellSouth's change control process for performance measurements. CLEC access to and input into this process would obviate some of the problems regarding lack of notice of performance measurement changes. KPMG, as part of the Third Party Test in Georgia, evaluated BellSouth's change control process for performance measures and found that CLECs are excluded entirely from the process. (STP Final Report, March 20, 2001, VIII-C-1). CLECs do not have access to the database BellSouth uses which includes a log of all issues for

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<sup>3</sup> *Id.* at 9.

all performance measurement change requests. Nor do CLECs have access to meetings where change requests are reviewed by subject matter experts ("SME's"), system managers and database administrators to determine what changes to the SQM and/or PMAP should be implemented. KPMG indicated that "The change development process would be improved by involving CLECs in meetings of the Change Control Board and other meetings related to change management." Further, KPMG recommended that BellSouth's database<sup>4</sup> should be available to non-BellSouth personnel, which can be done by having it posted to BellSouth's PMAP website. (STP Final Report, March 20, 2001, VIII-C-11 and C-13).

Based upon the foregoing, SECCA recommends that this Commission *immediately*:

1. Establish a date and time for an industry call with BellSouth so that all affected CLECs can have the opportunity to ask questions about the changes BellSouth has implemented as outlined in the May 23 and June 4, 2002 filings;

---

<sup>4</sup> "Issue Tracker" is the name of the database reviewed by KPMG into which all performance measurement change requests and logged issues are entered. Since the issuance of the Third Party Test Final Report in Georgia, the name of the database may have changed. However, BellSouth continues to retain this information in a tracking database.

2. Require all parties to provide comments on the impact of the changes outlined in the May 23 and June 4, 2002 filing no later than thirty (30) days after the industry call;

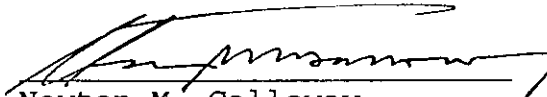
3. Issue an order as to which, if any, changes shall be allowed by this Commission and requiring BellSouth, if necessary, to rescind any changes outlined in the May 23 and June 4 filings that are not specifically approved; and

4. Order BellSouth to provide the Commission and all parties with at least sixty (60) days written notice of any proposed future performance measurement plan changes so that the procedure, as outlined above in 1-3, can be followed in addition to requiring BellSouth to allow CLECs to participate in change control board meetings regarding SQM and PMAP changes and have access to its metrics change management tracking database.

#### CONCLUSION

SECCA respectfully requests that this Commission grant this Emergency Motion and Order BellSouth to participate in an industry wide call to explain any performance measurement calculation changes, allow all parties thirty (30) days to provide comments on the changes, issue an Order on which changes shall be implemented and establish a procedure for future proposed performance measurement calculation changes.

Respectfully submitted, this 2<sup>nd</sup> day of June, 2002.



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Dean R. Fuchs  
Georgia Bar No.: 179170  
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(770) 233-6231 (Fax)

**ATTORNEYS FOR SOUTHEASTERN  
COMPETITIVE CARRIERS ASSOCIATION**

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing EMERGENCY MOTION OF THE SOUTHEASTERN COMPETITIVE CARRIERS ASSOCIATION TO ESTABLISH A PROCEDURE FOR IMPLEMENTATION OF CHANGES TO THE SERVICE QUALITY MEASURES upon the following persons by causing copies of the same to be placed in an envelope with adequate postage affixed thereon and deposited in the United States Mail addresses as follows:

Ms. Kristy R. Holley, Director  
Consumers' Utility Counsel  
Governor's Office of Consumer Affairs  
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Plaza Level, East Tower  
Atlanta, Georgia 30334-4600

Mr. Bennett L. Ross  
BellSouth Telecommunications, Inc.  
125 Perimeter Center West, Room 376  
Atlanta, Georgia 30346

Mr. Daniel Walsh  
Law Dept. - State of Georgia  
40 Capitol Square, Ste. 132  
Atlanta, Georgia 30034

Mr. Ronald V. Jackson  
Mr. Walt Saprionov  
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WorldCom, Inc.  
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Atlanta, Georgia 30328

Mr. Enrico C. Soriano  
Kelley, Drye & Warren, LLP  
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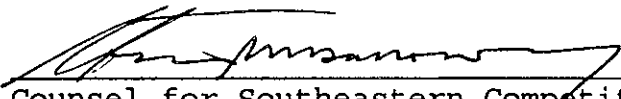
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This 12<sup>th</sup> day of June, 2002.

  
Counsel for Southeastern Competitive  
Carriers Association



## C. Test Results: Metrics Change Management Verification and Validation Review (PMR3)

### 1.0 Description

The objective of the Metrics Change Management Verification and Validation Review (PMR3) was to evaluate BellSouth's management of changes related to the production of its Service Quality Measurements (SQMs), including changes in the various legacy/source systems used to provide data for SQM calculations.

### 2.0 Methodology

This section summarizes the test methodology.

#### 2.1 Business Process Description

BellSouth's change management process for the production of performance measures is applicable to changes in the production and reporting of SQMs. Figure VIII-3.1 illustrates the procedures followed by BellSouth to consider changes to existing SQMs, and to address related production issues that may arise. Change requests arise from regulatory mandates as well as evolving internal and external business practices. Initially, requests are referred to the appropriate BellSouth Subject Matter Experts (SMEs), based upon the SQM(s) in question. When a change involves modifications to the Performance Measurement and Analysis Platform (PMAP) or other systems, the respective system managers and database administrators become involved in the change management process. Change requests are discussed during Change Control Board Meetings and other meetings concerned with the SQM production cycle.

The process also considers other issues that are related to the production of SQMs. These issues are classified into four categories: Data Issue, Non-System, Not Meeting Requirements, or Requirements Incorrect. These issues may be raised by any member of the PMAP production team, by SMEs, or by other BellSouth personnel. Issues falling in the last two categories are immediately converted into change requests and handled according to change request procedures.

All change requests and logged issues are entered into a database that BellSouth calls *Issue Tracker*. All SMEs and members of the PMAP production team have access to this database, and are expected to use it to log change requests or issues for consideration by the Change Control Board. Entries include a description of the issue or the required change, the date on which it was opened, the originator of the issue, the individual to whom it should be assigned, and fields for how and when the issue or change request is resolved. *Issue Tracker* assigns a number to each entry for tracking purposes.

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January 21, 2002

Mr. K. C. Timmons  
Manager - Supplier Performance Measurements  
AT&T Local Services – Southern Region  
1200 Peachtree Street  
Room 12227  
Atlanta, Georgia 30309

Re: *Performance Measurements for Telecommunications Interconnection, Unbundling and Resale*; Docket No. 7892-U

Dear K.C.:

Pursuant to our discussions at the workshops in the above-referenced proceeding, this letter is in response to the performance data issues raised in your e-mails to the AT&T account team. Each issue is summarized below, which is followed by BellSouth's response.

**Comparison of Flow Through Report and Acknowledgment Raw Data**

In your e-mail, you expressed concern about "significant discrepancies" between the number of Local Service Requests ("LSRs") as reflected in the Flow Through report for OCNs 8392, 8389, 8300, 7421, and 7125 for October 2001, as compared to the number of LSRs reflected in the raw data files for the Acknowledgment Message Timeliness and Completeness measures for the same month. You stated your expectation that "the volumes between these two reports" should match.

In fact, you should not expect the volume of LSRs reflected on the Flow Through report to match the number of LSRs in the raw data files for the Acknowledgment measures. There are multiple reasons why this is so, none of which has to do with "proper exclusions to the raw data," as suggested in your e-mail. First, EDI returns one acknowledgment per transmission (or a "envelope"), even though the transmission may contain multiple LSRs. Second, TAG returns acknowledgments on messages related to pre-order activity, which are not reflected on the Flow Through report. Third, Local Number Portability ("LNP") acknowledgments are included in the raw data for the Acknowledgment measures, but are reported separately on the LNP Flow Through report. Fourth, LSRs fatally rejected by TAG will receive an acknowledgment and be

Mr. K. C. Timmons  
January 21, 2002  
Page 2

included in the Acknowledgment raw data files, but will not be counted in the Flow Through report, since only LSRs rejected by LEO are counted as a fatal reject.

Please understand that these reasons alone do not explain the differences in the Flow Through results and Acknowledgment raw data noted in your e-mail for October 2001. This is because, as AT&T has previously been advised, BellSouth discovered that PMAP was not receiving feeds from two of its four TAG processors prior to November 7, 2001, which resulted in the acknowledgment count from TAG being understated. This issue was a reporting issue only and did not affect BellSouth's ability to receive and respond to LSRs submitted via TAG or any other interface. This issue was resolved on November 7, 2001, which was after BellSouth reported October 2001 results upon which you relied for purposes of your analysis. However, in future months, you should not expect to see the number of LSRs reported in the Flow Through report match the number of LSRs in the raw data files for the Acknowledgment measures, for the reasons previously explained.

**Comparison of Firm Order Confirmation and Reject Response Completeness Raw Data  
With Firm Order Confirmation Timeliness and Reject Interval Raw Data**

In your e-mail, you provided the results of your comparison between the Firm Order Confirmation ("FOC") and Reject Response Completeness raw data with the FOC Timeliness and Reject Interval data for September 2001, noting that these raw data files "are still not agreeing with each other." You provided specific examples of the discrepancies, each of which is explained below.

*"There are 480 LSRs in the Response Completeness raw data that have a 1, 2, or 3 in the 'RESP\_CNT' field (which means they either received a FOC or Reject) that did not have a corresponding LSR populated in the FOC or Reject raw data."*

Of the 480 LSRs in FOC and Reject Response Completeness raw data that AT&T claims are not in FOC Timeliness or Reject Interval raw data, 474 are, in fact, in BellSouth's September 2001 Reject Interval raw data. These 474 records are indicated in the attached supporting data file ('sep 01 response completeness analysis - Response.xls') by the text "Found in BST September 2001 Reject Interval raw data," which appears in the column titled "BellSouth Comment."

The remaining six LSRs do not appear in the September 2001 Reject Interval raw data because, while the LSRs were received in September, they were responded to on October 1, 2001. The FOC Timeliness and Reject Interval reports only capture responses sent in the reporting month regardless of when the LSR was received. By contrast, the FOC and Reject Response Completeness measure currently captures only LSRs received in the reporting month and responded to prior to the data snapshot being taken (generally on the 2<sup>nd</sup> day of the month).

As a result, these six LSRs are reflected in the September 2001 FOC and Reject Response Completeness raw data, but not in the September 2001 FOC Timeliness or Reject Interval raw data. These six records are indicated in the attached supporting data file ('sep 01 response completeness analysis - Response.xls') by the text "Responded to on October 1, 2001," which appears in the column entitled "BellSouth Comment."

*"There are 6 LSRs in the Response Completeness raw data file with a 0 in the "RESP\_CNT" field that do have a corresponding LSR populated in the FOC or Reject raw data. If they have a 0 in the "RESP\_CNT" field, then they should not have a FOC or Reject reported."*

In identifying six LSRs in the FOC and Reject Response Completeness raw data file with a '0' in the RESP\_CNT field that do not have corresponding LSRs populated in FOC Timeliness or Reject Interval raw data, AT&T matched the raw data by Purchase Order Number ("PON") and version. These six PON/version combinations were each submitted twice by AT&T with two different OCNs, 8300 and 8392. For each PON/version combination, one LSR received a response and one did not. AT&T was matching the LSR that did receive a response, as indicated by the record in FOC Timeliness or Reject Interval raw data, with the LSR that did not receive a response, as indicated by the '0' in the RESP\_CNT field of FOC and Reject Response Completeness raw data. However, these records do not actually match and there is no actual discrepancy, as the OCNs are different. These six LSRs are indicated in the attached supporting data file ('sep 01 response completeness analysis - Response.xls') by the text "This OCN/PON/VER combination is not in September 2001 Reject Interval or FOC Timeliness raw data," which appears in the column entitled "BellSouth Comment."

*"There are 17 LSRs populated in the FOC or Reject raw data that are not present in the Response Completeness raw data."*

The 17 LSRs found in FOC or Reject raw data that are not present in the FOC and Reject Response Completeness raw data for September were received in August and responded to in September. As explained above, the FOC Timeliness and Reject Interval reports only capture responses sent in the reporting month regardless of when the LSR was received, while the FOC and Reject Response Completeness measure currently captures only LSRs received in the reporting month and responded to prior to the data snapshot being taken. These 17 records are identified in the attached supporting data file ('sep 01 foc and reject raw data post exclusions - Response.xls') by the text "Received in August 2001 and responded to in September 2001" in the column named "BellSouth Comment."

Your e-mail also notes a "discrepancy" between the May 2001 raw data filed provided to AT&T by Viki Clayton and the May 2001 raw data file that AT&T downloaded from PMAP. The raw data files provided to AT&T by Ms. Clayton contain 721 records for OCN 8392. The first 606 records in this file match and are in the exact same order as the records in the file that

"AT&T pulled from PMAP...." However, the data provided on the PMAP website is not provided in MS Excel format, and it appears that the record set was truncated when AT&T loaded the data into Excel. Thus, this "discrepancy" noted in your e-mail was apparently caused by AT&T in downloading and populating the performance data, and not in BellSouth's reporting of that data. In fact, AT&T sent BellSouth a letter dated August 2, 2001 setting forth an analysis of raw data for May 2001, which, according to AT&T, contained 721 records. Since Ms. Clayton did not provide AT&T with the raw data file at issue until October 1, 2001, AT&T apparently had in its possession a raw data file for FOC and Reject Response Completeness for May 2001 with a record count of 721, which is the same record count in the files provided to AT&T by Ms. Clayton.

**Comparison of Order Completion Interval Raw Data and  
Average Completion Interval Raw Data**

In your e-mail, you provided a comparison of the Order Completion Interval ("OCI") raw data with the Average Completion Notice Interval ("ACNI") raw data. In making this comparison, you combined raw data files, because there are two raw data files for OCI and ACNI, one containing LNP data and the other containing non-LNP data. Your e-mail identified 1,412 LSRs that were completed during the month but which, according to AT&T, were not contained in the ACNI raw data files as having received a completion notice.

BellSouth has reviewed each of the 1,412 LSRs and has no reason to believe that completion notices were not actually sent for these service requests. That these LSRs did not appear in AT&T's ACNI raw data file is due to the following reasons:

First, approximately 309 of the LSRs were directory listing orders (class of service codes LNPRL and LNPBL). As you are aware, directing listing orders are excluded from the ACNI measure, and thus these types of orders would not appear in the ACNI raw data files.

Second, approximately 954 of the LSRs are trigger orders for standalone LNP, which did not carry an OCN on the LSR that would identify it as an AT&T order. As a result, these LSRs were listed in the raw data files as BellSouth orders. BellSouth has begun implementing a process to capture the OCN on trigger orders for standalone LNP, which should be completed with January 2002 data.

Third, 140 LSRs were projects, which, consistent with the Service Quality Measurement ("SQM") Plan, are excluded from the ordering raw data. LSRs excluded from ordering raw data are placed in an "error" file. BellSouth has discovered that, in matching completion notices with LSRs, PMAP was not looking at LSRs in this "error" file. BellSouth has begun implementing the necessary coding changes to capture for ACNI purposes those LSRs excluded from the ordering raw data, which should be implemented with January 2002 data.

Fourth, 7 of the LSRs are listed with OCNs other than AT&T's. In order to investigate these records further, AT&T will need to provide BellSouth with the telephone number from these orders.

Finally, 2 of the LSRs appear in the November ACNI raw data rather than in the October raw data files. This is due to an insignificant number of transactions closed toward the end of a given calendar month when technicians and field representatives fail to submit the paperwork or successfully close out or post the orders in a timely manner. Because BellSouth leaves the "processing window" open for a few days into the following calendar month to capture as many of these transactions as possible, the impact of these data exclusions is insignificant (typically less than 2% of all orders). BellSouth has a release planned to address this completion date grouping issue, which should be implemented with March or April data.

BellSouth has accounted for each of the 1,412 LSRs at issue and has explained why they did not appear in AT&T's ACNI raw data file for October 2001 (some LSRs did not appear for more than one reason). BellSouth recommends that the parties review ACNI raw data in a future month as part of an ongoing reconciliation process.

#### **Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices**

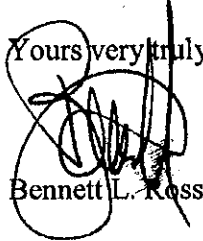
Your e-mail also questioned BellSouth's failure to include in the Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices measure those jeopardy notices issued on the same day as the committed due date. Your e-mail claims that, "by not counting its jeopardy notices, BellSouth is incorrectly reporting the percent jeopardy measure, and the average jeopardy notice interval is being incorrectly inflated" – a claim BellSouth denies.

As clearly set forth in the current SQM, the Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices measure is intended to capture "advance notice" provided to the CLEC "when BellSouth can determine in advance that a committed due date is in jeopardy for facility delay ...." The business rules make clear that the measure was not intended to capture jeopardies due to facility delays that BellSouth cannot detect in advance. Obviously, if BellSouth only detects a facility problem when the technician is on the premises to provision the loop on the due date, "advance notice" that the committed due date is in jeopardy would not be possible and thus would not be subject to this measure. While BellSouth and AT&T may disagree with the correct interpretation of the current measure, it was agreed in our recent workshops that jeopardies identified on the due date should be excluded from this measure (at least when the BellSouth technician is on the premises attempting to provide service and must refer to engineering or cable repair records for facility jeopardies), and an explicit exclusion to this effect has been proposed for inclusion in the next version of the SQM.

Mr. K. C. Timmons  
January 21, 2002  
Page 6

I hope this information adequately addresses AT&T's concerns. If you would like to meet personally with representatives of BellSouth to discuss these issues in greater detail, please let me know, and I will make the necessary arrangements.

Yours very truly,



Bennett L. Ross

BLR:nvd  
Enclosures

cc: Mr. Leon Bowles (w/o enclosures)  
Suzanne W. Ockleberry, Esquire (w/o enclosures)

428763

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
Consolidated CLEC 1<sup>st</sup> Data Requests  
May 23, 2002  
Item No. 21  
Page 1 of 1

**REQUEST:** Provide the date by which completion notices for orders completed in one month, but notice provided in another will be added to the Average Completion Notice Interval Measure.

**RESPONSE:** This issue is expected to be implemented with July 2002 data.



**CRSG Guidelines**

***CRSG Guidelines***

*Version 7, June 17, 2002*

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## CRSG Guidelines

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## **CRSG Guidelines**

### **Chapter 1.0 – Introduction**

#### **1.1 Purpose and Scope**

These Guidelines are intended to provide the CRSG (Complex Resale Support Group) with a general description of the procedures and guidelines to be followed in support of the CRSG/Account Team/CLEC Care Team and D/CLEC (Data/Competitive Local Exchange Carrier) customers. This document does not cover all possible activities and responsibilities but does address the primary responsibilities of the CRSG and outlines the instructions to be followed in general customer contacts and processing Complex LSRs (Local Service Requests).

#### **1.2 How to Use This Document**

This document is designed as a reference tool for CRSG/Account Team/CLEC Care Team members.

- Sections may be reviewed in any order
- The organization of the document is detailed in the Table of Contents

Included in the document are descriptions of the roles and responsibilities of the CRSG representatives including:

- A description and scope of services
- Hours of operation
- Internal escalation list
- After hours escalation procedures

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## CRSG Guidelines

### Chapter 1.0 – Introduction

#### 1.3 Disclaimer Statement

The information contained in this document is subject to change. BellSouth will provide notification of changes through the Interconnection Notification Process. This process entails a subsequent request being initiated on the Request for Documentation Form for an update to the existing document. This update may be requested by any entity within the Interconnection Department represented on the Account Team/CLEC Care Team. For additional information on this process, please refer to the Documentation Guidelines. A copy of these guidelines and the request form can be accessed by clicking on Documentation Guidelines on the Jammin' web site located at:

<http://user1.home.bst.bls.com/~jammin>

#### 1.4 Version History / Control

Any future modifications, and/or improvements that are made to the CRSG Guidelines will be reflected accordingly in this section of the document.

Section	Date/Version	Description
All	08/30/01 – Version 1.0	Initial Issue Release
Addition of a new Chapter "Rejection and Clarification Guidelines" Chapter 9.0 Acronyms has been renumbered to Chapter 10.0. Other minor highlighted changes on Pages 6, 13, 16, and 24.	10/01/01 – Version 2.0	Updated Version Release
Highlighted changes on Pages 8, 13, 22, and 24	10/18/2001 – Version 3.0	Updated Version Release
Highlighted additions and changes on Pages 4-5, 8, 10, and 14. In addition some page numbers have been renumbered in the Table of Contents	12/20/2001 – Version 4.0	Updated Version Release

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## CRSG Guidelines

### Chapter 1.0 – Introduction

Section	Date/Version	Description
Highlighted areas in Chapter 1 Pages 3-4; Chapter 2 Pages 5 & 7; Chapter 3 Pages 9-11; Chapter 4 Pages 12-13; Chapter 5 Pages 14-16; Chapter 7 Page 18 Chapter 8 – New Chapter Chapter 10 Pages 22-24 Chapter 11 Page 25	01/25/2002 – Version 5.0	Updated Version Release
Page 20 - Correct telephone numbers on escalation list – Changes are highlighted.	02-28-2002 – Version 6.0	Updated Version Release
Updated to reflect corrected telephone numbers on the escalation procedures on Pages 19 and 20.	06/17/2002	Updated Version Release

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## CRSG Guidelines

### Chapter 2.0 – Overview

The CRSG is an extended branch of the Account Team/CLEC Care Team and is divided into two (2) groups including:

- Complex Resale and UNE (Unbundled Network Element) Switched Combinations
- Complex UNE

These will be discussed in detail beginning on Page 8 of this document.

The CRSG is responsible for processing CLEC requests for Complex Resale and Complex UNE products. In most cases, references to the Account Team/CLEC Care Team in BellSouth Complex ordering documents are to the CRSG. The dedicated Account Team/CLEC Care Team will advise the CLEC of any instances where requests should come to them in lieu of the CRSG.

Examples of Complex **Resale** products include the following:

- Private Line Circuits
- Off Premise Extensions
- Tie Lines
- Basic Rate ISDN (Integrated Services Digital Network)
- Primary Rate ISDN
- Frame Relay
- All MegaLink/DS1 Products
- DID (Direct Inward Dialing)
- Centrex

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## CRSG Guidelines

### Chapter 2.0 – Overview

- SynchroNet®
- SMARTRing® Channel Activations
- LightGate/DS3
- UNE Switched Combinations products
  - Digital Direct Integration Termination Service (DDITS)
  - 2-Wire BRI (Basic Rate Interface) Digital Loop and Port Combos
  - 2-Wire Direct Inward Dial (DID) Trunk Port and Voice Grade Loop Combo
  - 4-Wire PRI (Primary Rate Interface) Digital Loop and Port Combinations
  - 4-Wire Digital Loop with Channelization and Port

Examples of Complex **UNE** products include the following:

- DS1 Loops, Local Channels and Interoffice Channels
- DS3 Loops, Local Channels and Interoffice Channels
- Dark Fiber
- EELs (Enhanced Extended Links)
- Non-Switched Combinations of Loops and Transport
- Sub Loops and Sub Loop Feeders

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## CRSG Guidelines

### Chapter 2.0 – Overview

- Digital Loops - ADSL (Asymmetrical Digital Subscriber Line) and HDSL (High Bit Rate Digital Subscriber Line)
- LMU (Loop Make-Up)
- Loop Modification
- Loop Concentration
- Network Terminating Wire

Contact with the CRSG begins **after** the D/CLEC has completed:

- The start-up process
- All paperwork enabling them to operate as a D/CLEC
- All contract negotiations

**NOTE: A Resale Agreement with BellSouth is required to issue Resale LSRs; a UNE Agreement with BellSouth required to issue UNE LSRs**

The Account Team/CLEC Care Team will provide contact information for the CRSG to the D/CLEC when they are ready to issue LSRs. The Account Team/CLEC Care Team's role is largely consultative. The Account Team/CLEC Care Team will be able to answer general product questions but once an LSR is submitted to the CRSG, the CRSG will become the single point of contact for that LSR.



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## CRSG Guidelines

### Chapter 3.0 – Complex Resale and UNE Switched Combination Orders

In order to serve customers as efficiently as possible, the CLEC will communicate with the CRSG Resale Group via email whenever possible. LSRs, SIs, CLEC initiated corrections and clarification responses will be directed to the following e-mail address:

<mailto:cis.crsg@bridge.bellsouth.com>

Only one (1) PON (SI and LSR) will be submitted per e-mail. The e-mail header will be formatted according to the following chart:

Type Request	Message Header
New Order	PON 12345 NEW
CLEC Initiated Update or Correction	PON 12345 CORRECTION/SUP
Clarification Response	PON 12345 CLARIFICATION RESPONSE
Status Request	PON 12345 STATUS

An Order Package consists of a LSR and an End User information form. In addition, some products require a product specific ordering form or Service Inquiry. The BellSouth Business Rules for Local Ordering contain a matrix listing the forms required for each complex service product including Resale and Switched Combinations. It will be used as a primary reference by the D/CLEC to determine what forms are needed when placing service orders with the CRSG. The BellSouth Business Rules for Local Ordering are located at:

<http://www.interconnection.bellsouth.com/guides/html/leo.html>

In addition to this reference, when placing service orders for Switched Combinations, the D/CLEC must consult the UNE Switched Combination Information Package (CLEC Information Package) located at:

<http://www.interconnection.bellsouth.com/products/html/unes.html>

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## CRSG Guidelines

### Chapter 3.0 – Complex Resale and UNE Switched Combination Orders

When a Complex Resale or Switched Combination service order request is received in the CRSB, the CRSB team member assigned to an order will:

- Review the submitted order package for accuracy and completeness
- Validate the appropriate UNE USOCs (Universal Service Order Codes), the addresses required to provision the circuit, the Q Account or BAN (Billing Account Number) information, and any other critical information

An order that is incomplete or contains incorrect information will be placed in **clarification** pending correction by the D/CLEC. When an order is placed in clarification all processing will stop; thus delaying the actual installation or inquiry. Orders not corrected with a supplemental order submission will be cancelled after 30 calendar days.

**NOTE: A Service Inquiry will be required for some products. During the Service Inquiry phase, clarification may be required by one of the groups outside the CRSB. The CRSB team member assigned to the order will act as the point of contact for such clarifications.**

Once all clarifications, if needed, have been resolved:

- The CRSB team member assigned to the order will forward the order package with the associated SI, if necessary, and a service transmittal to the appropriate LCSC for actual service order issuance. In the event the LCSC clarifies the submitted package, the CRSB team member assigned to the order will interface with the D/CLEC as needed to resolve the clarification issue.
- An FOC (Firm Order Confirmation) or PF (Pending Facilities) notification is provided to the CRSB by the LCSC. The CRSB team member assigned to the order is responsible for providing the D/CLEC with this status and coordinating with the CLEC with regard to expedites or PF issues.

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## CRSG Guidelines

### Chapter 3.0 – Complex Resale and UNE Switched Combination Orders

On the due date, the service is turned up to the end user and the CLEC contacted for acceptance by the CWINS (Customer Wholesale Interconnection Network Service) Center. Until the D/CLEC accepts the order, it will not complete. Once the order is completed, the PON is closed in the CRS and archived.

*continued on next page*

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## CRSG Guidelines

### Chapter 4.0 – Complex UNE

Complex UNE service order requests will be sent electronically via e-mail to the following address:

<mailto:crsg.une@bridge.bellsouth.com>

In order to serve the D/CLEC as efficiently as possible, the D/CLEC is requested to interact via e-mail whenever possible. Only one (1) PON (LSR and SI) will be sent per e-mail. In addition, the subject header in the e-mail will reflect one of the following:

Type of Request	Subject Header
New UNE Order	PON 12345 UNE NEW
New Line Share-Splitter Order	PON 12345 LSOD NEW
D/CLEC Initiated Correction or Update	PON 12345 CORRECTION
Clarification Request	PON 12345 CLARIFICATION RESPONSE
Status Request	PON 12345 STATUS REQUEST

An Order Package consists of a LSR, an End User information form, and a UNE Service Inquiry. A copy of the UNE SI can be obtained by contacting the Local Support Manager. The SI to be requested will depend upon the type of inquiry or product being ordered. The LSR and End User Information Forms are Telcordia documents that must be purchased. The D/CLEC's Local Support Manager will assist the D/CLEC in obtaining these forms.

*continued on next page*

## CRSG Guidelines

### Chapter 4.0 – Complex UNE Orders

When a Complex UNE or Non-Switched Combination service order request is received in the UNE CRSG, the CRSG team member assigned to an order will:

- Verify that the necessary ordering documents are present and complete; validate the End User address.

An order that is incomplete, contains incorrect information, or has an address that will not validate will be placed in **clarification** pending correction by the D/CLEC. When an order is placed in clarification all processing will stop; thus delaying the actual installation or inquiry. Orders not corrected with a supplemental order submission will be cancelled after 30 calendar days.

Once all necessary clarifications have been resolved, the CRSG team member assigned to the order will:

- Notify the D/CLEC if the Service Inquiry response indicates the requested service cannot be normally provisioned
- If the requested service is available, forward the package to the LCSC UNE group for order issuance
- Once confirmation has been made that the order has been received and accepted by the LCSC UNE group, the PON will be closed.

At this point, responsibility for the service order passes to the LCSC.

## **CRSG Guidelines**

### **Chapter 5.0 – CRSG Staffing**

The CRSG staff consists of:

- Sales Support Director
- Sales Support Managers
- Network Sales Engineers
- Industrial Specialists
- Contractors

Beginning below is description of each of these entities including the primary responsibilities of each.

#### **5.1 Sales Support Director**

The Sales Support Director is responsible for the following:

- Directs overall activities
- Supervises the Sales Support Managers, Network Sales Engineers II, and Industrial Specialists II including coaching/development, performance evaluations, and salary treatment
- Serves as a point of contact on escalations and general operational procedures

*continued on next page*

## **CRSG Guidelines**

### **Chapter 5.0 – CRSB Staffing**

#### **5.2 Sales Support Manager**

The Sales Support Manager is responsible for the following :

- Assists with the direction of overall activities
- Supervises the Network Sales Engineer, Industrial Specialist, and Contractor team members by providing coaching/development, performance evaluations, and salary treatment
- Serves as a point of contact on escalations

#### **5.3 Network Sales Engineer I**

The Network Sales Engineer I is responsible for the following:

- Processes more technical Complex LSRs
- Assists with cross training of product processes
- Serves as a point of contact on escalations

#### **5.4 Network Sales Engineer II**

The Network Sales Engineer II is responsible for the following:

- Provides technical mentoring for Network Sales Engineer , Industrial Specialist, and Contractor team members
- Insures product and process documentation is accurate for highly technical products
- Coordinates with staff to resolve issues and broken processes on highly technical products
- May serve as a point of contact on escalations

*continued on next page*

## **CRSG Guidelines**

### **Chapter 5.0 – CRSG Staffing**

#### **5.5 Industrial Specialist I**

The Industrial Specialist I is responsible for the following:

- Processes complex LSRs
- Assists with cross training of product processes
- Serves as a point of contact on escalations

#### **5.6 Industrial Specialist II**

The Industrial Specialist II is responsible for the following:

- Provides technical mentoring for Network Sales Engineer I, Industrial Specialist I, and Contractor team members
- Insures product and process documentation is accurate for complex products
- Coordinates with staff to resolve issues and broken processes on complex products
- May serve as a point of contact on escalations

#### **5.7 Contractor**

The Contractor(s) is responsible for the following:

- Processes complex LSRs
- Assists with cross training of product processes
- Serves as a member of Production Support Team and in some instances, serves as Team Lead.
- Serves as a point of contact on escalations



## **CRSG Guidelines**

### **Chapter 6.0 – Hours of Operation**

Business hours for the CRSG are defined as 8:00 AM – 5:00 PM, CST (Central Standard Time), Monday through Friday.

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## CRSG Guidelines

### Chapter 7.0 – Customer Interaction

Communication from a D/CLEC to the CRSG may be made by telephone, fax, e-mail, or U.S. mail. Typically, the response will be made in the same manner it was received.

Type of Communication	Communication Numbers/Addresses
Telephone	For telephone number(s), call 205 321-7702, or contact the CRSG team member assigned to the PON
Fax	1-800-365-8101
U. S. Mail	600 North 19 <sup>th</sup> Street 10 <sup>th</sup> Floor Birmingham, AL 35203
E-Mail	For Resale: <a href="mailto:cls.crsg@bridge.bellsouth.com">mailto:cls.crsg@bridge.bellsouth.com</a> For UNE: <a href="mailto:crsg.une@bridge.bellsouth.com">mailto:crsg.une@bridge.bellsouth.com</a>

## CRSG Guidelines

### Chapter 8.0 – CRSG Escalations

Escalations within the CRSG for Complex Resale and all Complex UNE requests will be handled as indicated below.

Level of Escalation	Refer To
First Level of Escalation	CRSG team member assigned to PON
Second Level of Escalation	Customer Care Advocate
	January: Anthony Hood- 205 321-2991 Anthony.hood@bridge.bellsouth.com
	February: Chris Patrick- 205 321-7739 Christopher.Patrick@bellsouth.com
	March: Alan Simpson- 205 321-4923 Alan.Simpson@bellsouth.com
	April: Timothy Hopkins- 205 321-2252 Timothy.Hopkins@bridge.bellsouth.com
	May: Elizabeth Dunn- 205 321-4962 Elizabeth.Dunn@bellsouth.com
	June: Jennifer Ragland- 205 321-2317 Jennifer.Ragland@bridge.bellsouth.com
	July: Maia Fountain- 205 321-4924 Maia.Fountain@bellsouth.com
	August: Christy Curtis- 205 321-7716 Christy.curtis@bridge.bellsouth.com
	September: Robin Hicks- 205 321-4912 Robin.Hicks@bridge.bellsouth.com

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## CRSG Guidelines

### Chapter 8.0 – CRS Escalations

Level of Escalation	Refer To
Third Level of Escalation	Industrial Specialist II
	Terri Cobb- 205 321-7745 Terri.Cobb@bridge.bellsouth.com
Fourth Level of Escalation	Sales Support Managers
	Kate DeLoach- 205 321-7796 Kate.Deloach1@bridge.bellsouth.com
	Martin Houston- 205 321-7791 Martin.Houston@bellsouth.com
Fifth Level of Escalation	Sales Support Director
	Tony Fowler- 205-321-7750 Tony.fowler1@bridge.bellsouth.com

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## CRSG Guidelines

### Chapter 9.0 – Voice Mail Guidelines

The following guidelines are in place to insure that voice mail messages are handled in an appropriate manner.

- Voice mail greetings will be changed daily to reflect current information. The greeting is designed to identify:
  - **Name of the CRSG representative**
  - **Company Name and Department**
  - **Why the representative is unavailable** (i.e., out of office, on another call, in a meeting, etc.)
  - **Message response frequency** (i.e., "I will get back with you by the end of the day", "I will get back with you when I return on Monday", etc.)
  - **Immediate assistance contact** (i.e., If you need immediate assistance, please press 0.)
  - **Pager Information**
  - **Emergency or Escalation Information** (Escalation procedures are included on Pages 10 and 14 of this document. Extended absence greetings will be utilized when CRSG representatives are out of the office and a backup person will be named as a part of the greeting.)
- Messages will be checked daily as frequently as possible
- The caller will **never** be advised to bypass the greeting
- If a back-up person's name is left for the D/CLEC to contact, insure that person is available and is prepared to take the calls.

## CRSG Guidelines

### Chapter 10.0 – Rejection and Clarification Guidelines

These guidelines apply **only** to those requests for complex services that are submitted to the Complex Resale Support Group. For additional information on basic service order submission, including instructions on which requests should be sent to the Local Carrier Service Center versus the Complex Resale Support Group, refer to the BellSouth Business Rules for Local Ordering TCIF9/LSOG4 located at:

<http://www.interconnection.bellsouth.com/guides/html/leo.html>

#### 10.1 Order Submission

The Complex Resale Support Group accepts local service requests via fax (800-365-8101) or email. E-Mails for Complex Resale and UNE Switched Combinations will be sent to:

<mailto:cis.crsg@bridge.bellsouth.com>

E-Mails for UNE Loops and Transport will be sent to:

<mailto:crsg.une@bridge.bellsouth.com>

Orders are pre-screened, acknowledged, and assigned to a CRSG team member. The acknowledgement is normally returned to the D/CLEC Initiator using the same method with which the order was submitted. This acknowledgement is provided back to the D/CLEC within 8 business hours from receipt.

The CRSG team member assigned to the order will contact the D/CLEC Initiator to provide his or her contact information within 24 hours. At this time, the D/CLEC Initiator also will have the opportunity to discuss the order with the CRSG team member assigned to the order. The Initiator will ask questions, express concerns, or clarify the request at the beginning of the process.

*continued on next page*

## **CRSG Guidelines**

### **Chapter 9.0 – Rejection and Clarification Guidelines**

#### **9.1 Initial Rejection**

Orders are rejected upon receipt in certain specific circumstances including the following:

- Orders for services that should have been handled by the LCSC without CRSG processing (includes requests already assigned to a CRSG team member)
- Orders found to be illegible or unprintable
- Orders that are obviously incomplete (e.g., LSR page blank, no end user page)
- CRSG team member, upon initial review, determines the service cannot be provided (i.e., tariff violation)

Rejections are returned to the D/CLEC using the same method as the order was delivered. Rejections are normally returned the same business day. The CRSG's business rule for calculating business days states that any submissions received after 3:00 PM Central Time are dated the following business day.

#### **9.2 Clarification**

The following guidelines are in place regarding clarifications:

- The CRSG team member assigned to an order makes every effort to include all clarifications in one request to the D/CLEC. However, there are occasions when this is not possible. Some clarification responses may alter the order in such a way that another clarification is triggered. Every attempt is made to issue the initial clarification within 48 hours of the receipt of the local service request.
- Clarification requests are sent to the D/CLEC Initiator. An initiator may request that all clarifications be sent via fax or e-mail. The presence of both a fax number and an e-mail address for the Initiator will be regarded as permission for the CRSG team member to use whichever method is most convenient, unless the Initiator indicates otherwise.

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## CRSG Guidelines

### Chapter 9.0 – Rejection and Clarification Guidelines

- An order in **Clarification** status will remain open for 30 calendar days. If a clarification response is **not** received within the allotted time, the CRSG team member assigned to the order will cancel the order and notify the D/CLEC that the order has been cancelled.
- Clarification may occur due to errors on the Local Service Request, End User information form, proprietary ordering document, or other submitted ordering documents. Orders are clarified by the CRSG for **any** errors discovered in the submitted paperwork.
- Clarifications are issued according to the standards included in the BellSouth Business Rules for Local Ordering.
- Every attempt is made to discover all errors in the CRSG. However, it is possible, that the LCSC Service Representative may discover an error on the paperwork, resulting in a clarification issued by the LCSC through the CRSG. Clarification responses will be returned to the Originator of the clarification form (i.e., the form originates in the CRSG, the response will be returned to the CRSG; the form originates in the LCSC, the response will be returned to the LCSC).
- Orders may also be clarified due to incomplete or incorrect technical information provided by the D/CLEC. Orders are clarified by the CRSG when the technical information provided by the D/CLEC is incomplete, incorrect, or incompatible.



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## CRSG Guidelines

### Chapter 10.0 – Acronyms

ADSL	Asymmetrical Digital Subscriber Line
BAN	Billing Account Number
BRI	Basic Rate Interface
CLEC	Competitive Local Exchange Carrier
CRSG	Complex Resale Support Group
CST	Central Standard Time
CWINS	Customer Wholesale Interconnection Network Service
DDITS	Digital Direct Integration Termination Service
DID	Direct Inward Dialing
DLEC	Data Local Exchange Carrier
FOC	Firm Order Confirmation
HDSL	High Bit Rate Digital Subscriber Line
ISDN	Integrated Services Digital Network
LMU	Loop Makeup
LSR	Local Service Request
PF	Pending Facilities
PON	Purchase Order Number

*continued on next page*

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## CRSG Guidelines

### Chapter 10.0 – Acronyms

PRI	Primary Rate Interface
SI	Service Inquiry
UNE	Unbundled Network Element
USOC	Universal Service Order Code

**REQUEST:** Describe in which performance measures BellSouth reports its rejection and FOC performance for each type of LSR submitted to the Complex Resale Support Group (CRSG).

**RESPONSE:** LSRs submitted to the CRSG and included in Performance Measurements results are currently reported in BellSouth's SQM in the Non-Mechanized categories for Percent Rejected Service Requests, Reject Interval, Firm Order Confirmation Timeliness, and Firm Order Confirmation and Reject Response Completeness under the following products:

Resale Design (Specials)  
UNE Loop + Port Combinations  
xDSL  
Local Interoffice Transport

Additionally xDSL and Local Interoffice Transport are reported in BellSouth's SQM in Service Inquiry with LSR Firm Order Confirmation Response Time - Manual.

**EXCEPTION 90**  
BellSouth Florida OSS Testing Evaluation

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Date: July 20, 2001**EXCEPTION REPORT**

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

**Exception:**

**KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and electronic mail. (TVV1)**

**Background:**

The Bell South Products & Service Interval Guide<sup>1</sup> states that BellSouth should return 85% of Non-Mechanized FOCs to CLECs within a defined interval for each product type.

**Issue:**

KPMG Consulting has received Non-Mechanized FOCs after the interval guide standard. The following are the Non-Mechanized FOC timeliness results as of July 16, 2001:

	On Time	Late	Total
Instances	128	31	159
Percentage	80%	20%	--

The following is a list of PONs that received Non-Mechanized FOCs after the interval guide standard

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
029021FPMC000004	VER 01 CR 01	7/13/01 1:28 PM	7/15/01 1:28 PM	7/16/01 9:10 AM	FAX
035051FPMC000003	00	4/2/01 5:14 PM	4/4/01 5:14 PM	4/5/01 9:35 AM	EMAIL

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<sup>1</sup> BellSouth Products & Services Interval Guide – Issue 4a 2001  
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## EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
035051FPMC010005	CR 01	6/19/01 4:10 PM	6/21/01 4:10 PM	6/27/01 3:11 PM	EMAIL
035081FPMC010001	REPON 1	4/5/01 4:19 PM	4/10/01 4:19 PM	4/13/01 3:49 PM	EMAIL
035081FPMC010002	REPON 1	5/14/01 5:50 PM	5/17/01 5:50 PM	5/22/01 3:06 PM	EMAIL
035081FPMC000003	VER 01	5/7/01 5:00 PM	5/10/01 5:00 PM	5/21/01 1:38 PM	EMAIL
035081FPMC000004	00	5/4/01 1:46 PM	5/9/01 1:46 PM	5/22/01 3:08 PM	EMAIL
035081FPMC000006	00	5/4/01 1:48 PM	5/9/01 1:48 PM	5/23/01 9:26 AM	EMAIL
035081FPMC000007	00	5/4/01 1:49 PM	5/9/01 1:49 PM	5/18/01 2:15 PM	EMAIL
036021FPMC010003	VER 01 CR 01	6/28/01 11:26 AM	7/2/01 11:26 AM	7/3/01 12:01 PM	EMAIL
036021FPMC010004	VER 01 CR 01	7/6/01 5:01 PM	7/8/01 5:01 PM	7/9/01 3:46 PM	EMAIL
036121FPMC000002	00	6/13/01 5:22 PM	6/15/01 5:22 PM	6/27/01 10:54 AM	EMAIL
040061FPMC000003	VER 00 CR 01	5/18/01 3:06 PM	5/27/01 3:06 PM	6/8/01 3:06 PM	EMAIL
056012FPMC020001	REPON 2	5/24/01 9:42 AM	5/29/01 9:42 AM	6/1/01 3:17 PM	EMAIL
056012FPMC010003	VER 01 CR	4/12/01 4:27 PM	4/17/01 4:27 PM	4/23/01 2:54 PM	EMAIL
056012FPMC000006	VER 01 CR 01	6/4/01 6:10 PM	6/7/01 6:10 PM	6/8/01 5:51 PM	EMAIL
056012FPMC010007	CR 01	5/8/01 6:10 PM	5/7/01 3:44 PM	5/18/01 3:37 PM	EMAIL
056012FPMC010008	CR 01	5/8/01 5:59 PM	5/11/01 5:59 PM	5/15/01 6:18 PM	EMAIL
056012FPMC000009	CR 02	4/3/01 12:18 PM	4/6/01 12:18 PM	4/13/01 4:24 PM	EMAIL
056012FPMC000010	00	5/24/01 3:40 PM	5/29/01 3:40 PM	6/15/01 2:57 PM	EMAIL

**EXCEPTION 90**  
BellSouth Florida OSS Testing Evaluation

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
056012FPMC000013	00	5/7/01 12:23 PM	5/10/01 12:23 PM	5/17/01 3:49 PM	EMAIL
056012FPMC000014	00	5/4/01 4:06 PM	5/9/01 4:06 PM	5/11/01 2:53 PM	EMAIL
058022FPMC000002	CR 01	3/15/01 12:09 PM	3/20/01 12:09 PM	4/3/01 1:46 PM	EMAIL
058031FPMC000001	CR 03	4/3/01 10:47 AM	4/6/01 10:47 AM	4/12/01 5:36 PM	EMAIL
058031FPMC000003	CR 02	4/3/01 9:55 AM	4/6/01 9:55 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000005	CR 02	4/3/01 10:21 AM	4/6/01 10:21 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000006	CR 02	4/3/01 10:31 AM	4/6/01 10:31 AM	4/11/01 4:47 PM	EMAIL
058031FPMC000007	VER 01 CR	4/10/01 3:08 PM	4/13/01 3:08 PM	4/17/01 4:45 PM	EMAIL
072131FPMC000027	VER 02 CR	6/22/01 11:42 AM	6/23/01 11:42 AM	6/28/01 9:46 AM	FAX
073051FPMC010027	VER 01 CR 01	6/18/01 5:33 PM	6/19/01 5:33 PM	6/21/01 3:08 PM	FAX
100012FPMC030001	REPON 3	7/12/01 6:05 PM	7/13/01 6:05 PM	7/16/01 8:35 AM	FAX

**Impact:**

The receipts of timely FOCs is a critical factor in the CLEC's ability to deliver service to customers in a timely manner. Delays in the return of FOCs could have a negative impact on the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

**AMENDED EXCEPTION 90**  
BellSouth Florida OSS Testing Evaluation

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Date: August 8, 2001**EXCEPTION REPORT**

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

**Exception:**

**KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and electronic mail. (TVV1)**

**Background:**

The Bell South Products & Service Interval Guide<sup>1</sup> states that BellSouth should return 85% of Non-Mechanized FOCs to CLECs within a defined interval for each product type.

**Issue:**

KPMG Consulting has received Non-Mechanized FOCs after the interval guide standard. The following are the Non-Mechanized FOC timeliness results as of July 16, 2001:

	On Time	Late	Total
<b>Instances</b>	128	31	159
<b>Percentage</b>	80%	20%	--

The following is a list of PONs that received Non-Mechanized FOCs after the interval guide standard

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
029021FPMC000004	VER 01 CR 01	7/13/01 1:28 PM	7/15/01 1:28 PM	7/16/01 9:10 AM	FAX
035051FPMC000003	00	4/2/01 5:14 PM	4/4/01 5:14 PM	4/5/01 9:35 AM	EMAIL

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<sup>1</sup> BellSouth Products & Services Interval Guide – Issue 4a 2001  
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**AMENDED EXCEPTION 90**  
BellSouth Florida OSS Testing Evaluation

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
035051FPMC010005	CR 01	6/19/01 4:10 PM	6/21/01 4:10 PM	6/27/01 3:11 PM	EMAIL
035081FPMC010001	REPON 1	4/5/01 4:19 PM	4/10/01 4:19 PM	4/13/01 3:49 PM	EMAIL
035081FPMC010002	REPON 1	5/14/01 5:50 PM	5/17/01 5:50 PM	5/22/01 3:06 PM	EMAIL
035081FPMC000003	VER 01	5/7/01 5:00 PM	5/10/01 5:00 PM	5/21/01 1:38 PM	EMAIL
035081FPMC000004	00	5/4/01 1:46 PM	5/9/01 1:46 PM	5/22/01 3:08 PM	EMAIL
035081FPMC000006	00	5/4/01 1:48 PM	5/9/01 1:48 PM	5/23/01 9:26 AM	EMAIL
035081FPMC000007	00	5/4/01 1:49 PM	5/9/01 1:49 PM	5/18/01 2:15 PM	EMAIL
036021FPMC010003	VER 01 CR 01	6/28/01 11:26 AM	7/2/01 11:26 AM	7/3/01 12:01 PM	EMAIL
036021FPMC010004	VER 01 CR 01	7/6/01 5:01 PM	7/8/01 5:01 PM	7/9/01 3:46 PM	EMAIL
036121FPMC000002	00	6/13/01 5:22 PM	6/15/01 5:22 PM	6/27/01 10:54 AM	EMAIL
040061FPMC000003	VER 00 CR 01	5/18/01 3:06 PM	5/27/01 3:06 PM	6/8/01 3:06 PM	EMAIL
056012FPMC020001	REPON 2	5/24/01 9:42 AM	5/29/01 9:42 AM	6/1/01 3:17 PM	EMAIL
056012FPMC010003	VER 01 CR	4/12/01 4:27 PM	4/17/01 4:27 PM	4/23/01 2:54 PM	EMAIL
056012FPMC000006	VER 01 CR 01	6/4/01 6:10 PM	6/7/01 6:10 PM	6/8/01 5:51 PM	EMAIL
056012FPMC010007	CR 01	5/8/01 6:10 PM	5/7/01 3:44 PM	5/18/01 3:37 PM	EMAIL
056012FPMC010008	CR 01	5/8/01 5:59 PM	5/11/01 5:59 PM	5/15/01 6:18 PM	EMAIL
056012FPMC000009	CR 02	4/3/01 12:18 PM	4/6/01 12:18 PM	4/13/01 4:24 PM	EMAIL
056012FPMC000010	00	5/24/01 3:40 PM	5/29/01 3:40 PM	6/15/01 2:57 PM	EMAIL



## AMENDED EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
056012FPMC000013	00	5/7/01 12:23 PM	5/10/01 12:23 PM	5/17/01 3:49 PM	EMAIL
056012FPMC000014	00	5/4/01 4:06 PM	5/9/01 4:06 PM	5/11/01 2:53 PM	EMAIL
058022FPMC000002	CR 01	3/15/01 12:09 PM	3/20/01 12:09 PM	4/3/01 1:46 PM	EMAIL
058031FPMC000001	CR 03	4/3/01 10:47 AM	4/6/01 10:47 AM	4/12/01 5:36 PM	EMAIL
058031FPMC000003	CR 02	4/3/01 9:55 AM	4/6/01 9:55 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000005	CR 02	4/3/01 10:21 AM	4/6/01 10:21 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000006	CR 02	4/3/01 10:31 AM	4/6/01 10:31 AM	4/11/01 4:47 PM	EMAIL
058031FPMC000007	VER 01 CR	4/10/01 3:08 PM	4/13/01 3:08 PM	4/17/01 4:45 PM	EMAIL
072131FPMC000027	VER 02 CR	6/22/01 11:42 AM	6/23/01 11:42 AM	6/28/01 9:46 AM	FAX
073051FPMC010027	VER 01 CR 01	6/18/01 5:33 PM	6/19/01 5:33 PM	6/21/01 3:08 PM	FAX
100012FPMC030001	REPON 3	7/12/01 6:05 PM	7/13/01 6:05 PM	7/16/01 8:35 AM	FAX

#### Amended Exception:

*KPMG Consulting amended this exception prior to BellSouth response to the PONs listed above.*

#### Background:

According to Ordering Measure O-9 of the Service Quality Measurement Plan<sup>2</sup>, BellSouth should return  $\geq 85\%$  of non-mechanized FOCs to Competitive Local Exchange Carriers (CLECs) within thirty-six (36) hours of receiving the Local Service Request (LSR). During the production test, KPMG Consulting received non-mechanized FOCs in greater than the thirty-six hour interval.

<sup>2</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

## AMENDED EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

**Issue:**

The following are the non-mechanized FOC timeliness results from March 13, 2001 through July 31, 2001.

ISSUE 1	<36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>=72 hrs	Total
Number of Transactions	136	9	10	38	193
Percent	70%	5%	5%	20%	100%

Following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within thirty-six hours.

PON	Ver	CC	LSR Sent	FOC Received
058031FPMC010002	00	9993	6/19/01 4:12 PM	7/30/01 3:12 PM
056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
043021FPMC020001	00	9993	7/10/01 5:35 PM	7/24/01 2:48 PM
035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
058022FPMC000001	01	9993	7/17/01 3:41 PM	7/30/01 3:12 PM

**AMENDED EXCEPTION 90**  
BellSouth Florida OSS Testing Evaluation

PON	Ver	CC	LSR Sent	FOC Received
035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
058031FPMC000001	00	9990	4/3/01 10:47 AM	4/12/01 5:36 PM
042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 12:02 PM
042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
035051FPMC010005	00	9990	6/19/01 4:10 PM	6/27/01 3:11 PM
058031FPMC000003	00	9990	4/3/01 9:55 AM	4/10/01 5:08 PM
058031FPMC000005	00	9990	4/3/01 10:21 AM	4/10/01 5:08 PM
058031FPMC000007	01	9990	4/10/01 3:08 PM	4/17/01 4:45 PM
042031FPMC000002	00	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
042031FPMC000004	00	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
042031FPMC000005	00	9990	7/18/01 4:53 PM	7/25/01 12:12 PM
036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM

**AMENDED EXCEPTION 90**  
BellSouth Florida OSS Testing Evaluation

PON	Ver	CC	LSR Sent	FOC Received
035081FPMC010002	00	9990	5/17/01 11:40 AM	5/22/01 3:06 PM
036021FPMC010003	01	9990	6/28/01 11:26 AM	7/3/01 12:01 PM
056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
060011FPMC000002	04	9993	7/26/01 4:30 PM	7/30/01 3:16 PM
043021FPMC002001	01	9993	7/20/01 4:52 PM	7/24/01 2:45 PM
100012FPMC030001	00	9990	7/12/01 6:05 PM	7/16/01 8:35 AM
035051FPMC000003	00	9990	4/2/01 5:14 PM	4/5/01 9:35 AM
029021FPMC020003	04	9993	7/18/01 3:11 PM	7/20/01 8:10 PM
029021FPMC000005	02	9993	7/18/01 3:32 PM	7/20/01 8:14 PM
058031FPMC000011	01	9993	4/10/01 3:11 PM	4/12/01 6:17 PM
058031FPMC000010	01	9993	4/10/01 3:10 PM	4/12/01 6:13 PM
058031FPMC000009	01	9993	4/10/01 3:09 PM	4/12/01 6:10 PM
058031FPMC000008	01	9993	4/10/01 3:09 PM	4/12/01 6:05 PM
056012FPMC000011	01	9990	6/13/01 12:04 PM	6/15/01 2:58 PM
035051FPMC000004	00	9990	4/3/01 11:46 AM	4/5/01 2:16 PM
042031FPMC030001	03	9990	7/3/01 4:00 PM	7/5/01 6:01 PM
058031FPMC000004	00	9993	4/9/01 5:27 PM	4/11/01 4:47 PM
058031FPMC000006	00	9993	4/9/01 6:21 PM	4/11/01 4:47 PM
035051FPMC000002	00	9990	4/3/01 11:22 AM	4/5/01 9:46 AM
072131FPMC000027	02	9993	6/26/01 1:13 PM	6/28/01 9:46 AM
028011FPMC000004	01	9993	6/20/01 3:49 PM	6/22/01 11:25 AM

**AMENDED EXCEPTION 90**  
BellSouth Florida OSS Testing Evaluation

PON	Ver	CC	LSR Sent	FOC Received
025011FPMC010006	00	9990	5/8/01 5:31 PM	5/10/01 12:40 PM
025011FPMC010004	00	9990	5/8/01 5:29 PM	5/10/01 12:05 PM
025011FPMC010005	00	9990	5/8/01 5:30 PM	5/10/01 12:00 PM
025011FPMC010002	00	9990	5/8/01 5:27 PM	5/10/01 11:05 AM

**Impact:**

The receipts of timely FOCs is a critical factor in the CLEC's ability to deliver service to customers in a timely manner. Delays in the return of FOCs could have a negative impact on the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

# FLORIDA OSS BELL SOUTH'S RESPONSE TO AMENDED EXCEPTION 90



Florida OSS Test  
Amended Exception # 90

Date: August 22, 2001

## EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

### Exception:

**KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and electronic mail. (TVV1)**

### Background:

The Bell South Products & Service Interval Guide<sup>1</sup> states that BellSouth should return 85% of Non-Mechanized FOCs to CLECs within a defined interval for each product type.

### Issue:

KPMG Consulting has received Non-Mechanized FOCs after the interval guide standard. The following are the Non-Mechanized FOC timeliness results as of July 16, 2001:

	On Time	Late	Total
<b>Instances</b>	128	31	159
<b>Percentage</b>	80%	20%	--

The following is a list of PONs that received Non-Mechanized FOCs after the interval guide standard

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
029021FPMC000004	VER 01 CR 01	7/13/01 1:28 PM	7/15/01 1:28 PM	7/16/01 9:10 AM	FAX
035051FPMC000003	00	4/2/01 5:14 PM	4/4/01 5:14 PM	4/5/01 9:35 AM	EMAIL
035051FPMC010005	CR 01	6/19/01 4:10 PM	6/21/01 4:10 PM	6/27/01 3:11 PM	EMAIL
035081FPMC010001	REPON 1	4/5/01 4:19 PM	4/10/01 4:19 PM	4/13/01 3:49 PM	EMAIL
035081FPMC010002	REPON 1	5/14/01 5:50 PM	5/17/01 5:50 PM	5/22/01 3:06 PM	EMAIL
035081FPMC000003	VER 01	5/7/01 5:00 PM	5/10/01 5:00 PM	5/21/01 1:38 PM	EMAIL

<sup>1</sup> BellSouth Products & Services Interval Guide – Issue 4a 2001

## FLORIDA OSS BELL SOUTH'S RESPONSE TO AMENDED EXCEPTION 90

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
035081FPMC000004	00	5/4/01 1:46 PM	5/9/01 1:46 PM	5/22/01 3:08 PM	EMAIL
035081FPMC000006	00	5/4/01 1:48 PM	5/9/01 1:48 PM	5/23/01 9:26 AM	EMAIL
035081FPMC000007	00	5/4/01 1:49 PM	5/9/01 1:49 PM	5/18/01 2:15 PM	EMAIL
036021FPMC010003	VER 01 CR 01	6/28/01 11:26 AM	7/2/01 11:26 AM	7/3/01 12:01 PM	EMAIL
036021FPMC010004	VER 01 CR 01	7/6/01 5:01 PM	7/8/01 5:01 PM	7/9/01 3:46 PM	EMAIL
036121FPMC000002	00	6/13/01 5:22 PM	6/15/01 5:22 PM	6/27/01 10:54 AM	EMAIL
040061FPMC000003	VER 00 CR 01	5/18/01 3:06 PM	5/27/01 3:06 PM	6/8/01 3:06 PM	EMAIL
056012FPMC020001	REPON 2	5/24/01 9:42 AM	5/29/01 9:42 AM	6/1/01 3:17 PM	EMAIL
056012FPMC010003	VER 01 CR	4/12/01 4:27 PM	4/17/01 4:27 PM	4/23/01 2:54 PM	EMAIL
056012FPMC000006	VER 01 CR 01	6/4/01 6:10 PM	6/7/01 6:10 PM	6/8/01 5:51 PM	EMAIL
056012FPMC010007	CR 01	5/8/01 6:10 PM	5/7/01 3:44 PM	5/18/01 3:37 PM	EMAIL
056012FPMC010008	CR 01	5/8/01 5:59 PM	5/11/01 5:59 PM	5/15/01 6:18 PM	EMAIL
056012FPMC000009	CR 02	4/3/01 12:18 PM	4/6/01 12:18 PM	4/13/01 4:24 PM	EMAIL
056012FPMC000010	00	5/24/01 3:40 PM	5/29/01 3:40 PM	6/15/01 2:57 PM	EMAIL
056012FPMC000013	00	5/7/01 12:23 PM	5/10/01 12:23 PM	5/17/01 3:49 PM	EMAIL
056012FPMC000014	00	5/4/01 4:06 PM	5/9/01 4:06 PM	5/11/01 2:53 PM	EMAIL
058022FPMC000002	CR 01	3/15/01 12:09 PM	3/20/01 12:09 PM	4/3/01 1:46 PM	EMAIL
058031FPMC000001	CR 03	4/3/01 10:47 AM	4/6/01 10:47 AM	4/12/01 5:36 PM	EMAIL
058031FPMC000003	CR 02	4/3/01 9:55 AM	4/6/01 9:55 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000005	CR 02	4/3/01 10:21 AM	4/6/01 10:21 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000006	CR 02	4/3/01 10:31 AM	4/6/01 10:31 AM	4/11/01 4:47 PM	EMAIL
058031FPMC000007	VER 01 CR	4/10/01 3:08 PM	4/13/01 3:08 PM	4/17/01 4:45 PM	EMAIL
072131FPMC000027	VER 02 CR	6/22/01 11:42 AM	6/23/01 11:42 AM	6/28/01 9:46 AM	FAX
073051FPMC010027	VER 01 CR 01	6/18/01 5:33 PM	6/19/01 5:33 PM	6/21/01 3:08 PM	FAX

## FLORIDA OSS BELLSOUTH'S RESPONSE TO AMENDED EXCEPTION 90

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
100012FPMC030001	REPON 3	7/12/01 6:05 PM	7/13/01 6:05 PM	7/16/01 8:35 AM	FAX

**Amended Exception:**

*KPMG Consulting amended this exception prior to BellSouth response to the PONs listed above.*

**Background:**

According to Ordering Measure O-9 of the Service Quality Measurement Plan<sup>2</sup>, BellSouth should return  $\geq 85\%$  of non-mechanized FOCs to Competitive Local Exchange Carriers (CLECs) within thirty-six (36) hours of receiving the Local Service Request (LSR). During the production test, KPMG Consulting received non-mechanized FOCs in greater than the thirty-six hour interval.

**Issue:**

The following are the non-mechanized FOC timeliness results from March 13, 2001 through July 31, 2001.

ISSUE 1	<36 hrs	$\geq 36$ and <48 hrs	$\geq 48$ and <72 hrs	$\geq 72$ hrs	Total
Number of Transactions	136	9	10	38	193
Percent	70%	5%	5%	20%	100%

Following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within thirty-six hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	058031FPMC010002	00	9993	6/19/01 4:12 PM	7/30/01 3:12 PM
2	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
3	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
4	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
5	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
6		00	9990	5/4/01 1:46 PM	5/22/01 3:08

<sup>2</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001



# FLORIDA OSS BELLSOUTH'S RESPONSE TO AMENDED EXCEPTION 90

Item	PON	Ver	CC	LSR Sent	FOC Received
	035081FPMC000004				PM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	043021FPMC020001	00	9993	7/10/01 5:35 PM	7/24/01 2:48 PM
9	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	058022FPMC000001	01	9993	7/17/01 3:41 PM	7/30/01 3:12 PM
12	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
13	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
14	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
15	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
16	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
17	058031FPMC000001	00	9990	4/3/01 10:47 AM	4/12/01 5:36 PM
18	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 12:02 PM
19	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
20	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
21	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
22	035051FPMC010005	00	9990	6/19/01 4:10 PM	6/27/01 3:11 PM
23	058031FPMC000003	00	9990	4/3/01 9:55 AM	4/10/01 5:08 PM
24	058031FPMC000005	00	9990	4/3/01 10:21 AM	4/10/01 5:08 PM
25	058031FPMC000007	01	9990	4/10/01 3:08 PM	4/17/01 4:45 PM
26	042031FPMC000002	00	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
27	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
28	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20

**FLORIDA OSS BELLSOUTH'S RESPONSE TO AMENDED  
EXCEPTION 90**

Item	PON	Ver	CC	LSR Sent	FOC Received
					PM
29	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
30	042031FPMC000004	00	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
31	042031FPMC000005	00	9990	7/18/01 4:53 PM	7/25/01 12:12 PM
32	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
33	035081FPMC010002	00	9990	5/17/01 11:40 AM	5/22/01 3:06 PM
34	036021FPMC010003	01	9990	6/28/01 11:26 AM	7/3/01 12:01 PM
35	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
36	060011FPMC000002	04	9993	7/26/01 4:30 PM	7/30/01 3:16 PM
37	043021FPMC002001	01	9993	7/20/01 4:52 PM	7/24/01 2:45 PM
38	100012FPMC030001	00	9990	7/12/01 6:05 PM	7/16/01 8:35 AM
39	035051FPMC000003	00	9990	4/2/01 5:14 PM	4/5/01 9:35 AM
40	029021FPMC020003	04	9993	7/18/01 3:11 PM	7/20/01 8:10 PM
41	029021FPMC000005	02	9993	7/18/01 3:32 PM	7/20/01 8:14 PM
42	058031FPMC000011	01	9993	4/10/01 3:11 PM	4/12/01 6:17 PM
43	058031FPMC000010	01	9993	4/10/01 3:10 PM	4/12/01 6:13 PM
44	058031FPMC000009	01	9993	4/10/01 3:09 PM	4/12/01 6:10 PM
45	058031FPMC000008	01	9993	4/10/01 3:09 PM	4/12/01 6:05 PM
46	056012FPMC000011	01	9990	6/13/01 12:04 PM	6/15/01 2:58 PM
47	035051FPMC000004	00	9990	4/3/01 11:46 AM	4/5/01 2:16 PM
48	042031FPMC030001	03	9990	7/3/01 4:00 PM	7/5/01 6:01 PM
49	058031FPMC000004	00	9993	4/9/01 5:27 PM	4/11/01 4:47 PM
50	058031FPMC000006	00	9993	4/9/01 6:21 PM	4/11/01 4:47 PM
51	035051FPMC000002	00	9990	4/3/01 11:22 AM	4/5/01 9:46

## FLORIDA OSS BELL SOUTH'S RESPONSE TO AMENDED EXCEPTION 90

Item	PON	Ver	CC	LSR Sent	FOC Received
					AM
52	072131FPMC000027	02	9993	6/26/01 1:13 PM	6/28/01 9:46 AM
53	028011FPMC000004	01	9993	6/20/01 3:49 PM	6/22/01 11:25 AM
54	025011FPMC010006	00	9990	5/8/01 5:31 PM	5/10/01 12:40 PM
55	025011FPMC010004	00	9990	5/8/01 5:29 PM	5/10/01 12:05 PM
56	025011FPMC010005	00	9990	5/8/01 5:30 PM	5/10/01 12:00 PM
57	025011FPMC010002	00	9990	5/8/01 5:27 PM	5/10/01 11:05 AM

### Impact:

The receipt of timely FOCs is a critical factor in the CLEC's ability to deliver service to customers in a timely manner. Delays in the return of FOCs could have a negative impact on the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

### BellSouth's Response:

BellSouth's findings are listed below by item number. All times listed are Central times.

Complex services ordered with a service inquiry are measured under 0-10 Service Inquiry with LSR Firm Order Confirmation Response Time Manual. It measures the interval and the percent within the interval from the submission of a Service Inquiry (SI) with Firm Order LSR to the distribution of a Firm Order Confirmation (FOC). It appears that KPMG failed to use the applicable SQM measure for services requiring a service inquiry processed in the CRS. The O-9 SQM measure does not apply to non-mechanized complex services requiring service inquiries.

According to Ordering Measure O-9 Firm Order Confirmation Timeliness for the Service Quality Measurement Plan of BellSouth's OSS Testing Florida Interim Performance Metrics Version 3.0, it appears that KPMG failed to consider applicable exclusions in their calculation for the 36-hour interval for non-mechanized FOCs.

Item 1: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 2: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 3: Agree with KPMG. UNE Combo BRI.

## **FLORIDA OSS BELL SOUTH'S RESPONSE TO AMENDED EXCEPTION 90**

- Item 4: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 5: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 6: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 7: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 8: Agree with KPMG. Resale BRI.
- Item 9: Agree with KPMG. Resale BRI.
- Item 10: Agree with KPMG. UNE Combo BRI.
- Item 11: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 12: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 does not apply for this service.
- Item 13: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 14: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 15: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 16: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 17: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 18: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.

## **FLORIDA OSS BELL SOUTH'S RESPONSE TO AMENDED EXCEPTION 90**

- Item 19: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 20: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 21: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 22: Agree with KPMG. UNE Combo BRI.
- Item 23: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 24: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 25: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 26: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 27: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 28: Agree with KPMG. UNE Combo BRI.
- Item 29: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 30: Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.
- Item 31: Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.
- Item 32: Agree with KPMG. UNE Combo BRI.
- Item 33: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 34: Do not agree. UNE Combo BRI. CRSG has no record of receipt on 06/28. LSR received 07/02 07:11. FOC sent 07/03 12:01.

## **FLORIDA OSS BELL SOUTH'S RESPONSE TO AMENDED EXCEPTION 90**

- Item 35: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 36: Do not agree. DID order. Service Inquiry required. O-9 SQM does not apply.
- Item 37: Agree with KPMG. Resale BRI.
- Item 38: Do not agree. LSR received 07/13 08:48. FOC sent 07/16 08:33.
- Item 39: Do not agree with KPMG. UNE Combo BRI. LSR received 04/03 16:13. FOC sent 04/05 08:35.
- Item 40: Do not agree. LSR received 07/18 15:06. FOC sent 07/19 10:55.
- Item 41: Do not agree. LSR received 07/18 15:28. FOC sent 07/19 11:57.
- Item 42: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 43: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 44: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 45: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 46: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 47: Do not agree. UNE Combo BRI. LSR received 04/03 10:45. FOC sent 04/05 01:16.
- Item 48: Do not agree. Resale PRI. Service Inquiry required. O-9 does not apply.
- Item 49: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 50: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

## **FLORIDA OSS BELLSOUTH'S RESPONSE TO AMENDED EXCEPTION 90**

Item 51: Do not agree. UNE Combo BRI. LSR received 04/03 13:06. FOC sent 04/05 07:52.

Item 52: Do not agree. UNE Combo BRI. LSR received 06/26 12:13.

Item 53: Do not agree. LSR received 06/20 15:46; FOC sent 06/22 11:20.

Item 54: Do not agree. LSR received 05/09 14:46; FOC sent 05/10 12:36.

Item 55: Do not agree. LSR received 05/09 14:36; FOC sent 5/10 12:02.

Item 56: Do not agree. LSR received date 05/09 14:40; FOC sent 5/10 11:56. 05/10/2001.

Item 57: Do not agree. LSR received date 05/09 14:28; FOC to customer 05/10 11:00.

### **Summary of FOC Timeliness Results – Non-Mechanized Firm Order Confirmations (FOCs):**

# of Transactions = 157 (36 PONS excluded – SQM O-9 does not apply)  
# Missed FOCs = 6  
# Met FOCs = 151  
% FOCs Returned = 96.2%

# FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90



Florida OSS Test  
Amended Exception # 90

Date: November 13, 2001

## EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

### Exception:

**KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and electronic mail. (TVV1)**

### Background:

The Bell South Products & Service Interval Guide<sup>1</sup> states that BellSouth should return 85% of Non-Mechanized FOCs to CLECs within a defined interval for each product type.

### Issue:

KPMG Consulting has received Non-Mechanized FOCs after the interval guide standard. The following are the Non-Mechanized FOC timeliness results as of July 16, 2001:

	On Time	Late	Total
<b>Instances</b>	128	31	159
<b>Percentage</b>	80%	20%	--

The following is a list of PONs that received Non-Mechanized FOCs after the interval guide standard

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
029021FPMC000004	VER 01 CR 01	7/13/01 1:28 PM	7/15/01 1:28 PM	7/16/01 9:10 AM	FAX
035051FPMC000003	00	4/2/01 5:14 PM	4/4/01 5:14 PM	4/5/01 9:35 AM	EMAIL
035051FPMC010005	CR 01	6/19/01 4:10 PM	6/21/01 4:10 PM	6/27/01 3:11 PM	EMAIL
035081FPMC010001	REPON 1	4/5/01 4:19 PM	4/10/01 4:19 PM	4/13/01 3:49 PM	EMAIL
035081FPMC010002	REPON 1	5/14/01 5:50 PM	5/17/01 5:50 PM	5/22/01 3:06 PM	EMAIL
035081FPMC000003	VER 01	5/7/01 5:00 PM	5/10/01 5:00 PM	5/21/01 1:38 PM	EMAIL
035081FPMC000004	00	5/4/01 1:46 PM	5/9/01 1:46 PM	5/22/01 3:08 PM	EMAIL
035081FPMC000006	00	5/4/01 1:48 PM	5/9/01 1:48 PM	5/23/01 9:26 AM	EMAIL
035081FPMC000007	00	5/4/01 1:49 PM	5/9/01 1:49 PM	5/18/01 2:15 PM	EMAIL

<sup>1</sup> BellSouth Products & Services Interval Guide – Issue 4a 2001



## FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
036021FPMC010003	VER 01 CR 01	6/28/01 11:26 AM	7/2/01 11:26 AM	7/3/01 12:01 PM	EMAIL
036021FPMC010004	VER 01 CR 01	7/6/01 5:01 PM	7/8/01 5:01 PM	7/9/01 3:46 PM	EMAIL
036121FPMC000002	00	6/13/01 5:22 PM	6/15/01 5:22 PM	6/27/01 10:54 AM	EMAIL
040061FPMC000003	VER 00 CR 01	5/18/01 3:06 PM	5/27/01 3:06 PM	6/8/01 3:06 PM	EMAIL
056012FPMC020001	REPON 2	5/24/01 9:42 AM	5/29/01 9:42 AM	6/1/01 3:17 PM	EMAIL
056012FPMC010003	VER 01 CR	4/12/01 4:27 PM	4/17/01 4:27 PM	4/23/01 2:54 PM	EMAIL
056012FPMC000006	VER 01 CR 01	6/4/01 6:10 PM	6/7/01 6:10 PM	6/8/01 5:51 PM	EMAIL
056012FPMC010007	CR 01	5/8/01 6:10 PM	5/7/01 3:44 PM	5/18/01 3:37 PM	EMAIL
056012FPMC010008	CR 01	5/8/01 5:59 PM	5/11/01 5:59 PM	5/15/01 6:18 PM	EMAIL
056012FPMC000009	CR 02	4/3/01 12:18 PM	4/6/01 12:18 PM	4/13/01 4:24 PM	EMAIL
056012FPMC000010	00	5/24/01 3:40 PM	5/29/01 3:40 PM	6/15/01 2:57 PM	EMAIL
056012FPMC000013	00	5/7/01 12:23 PM	5/10/01 12:23 PM	5/17/01 3:49 PM	EMAIL
056012FPMC000014	00	5/4/01 4:06 PM	5/9/01 4:06 PM	5/11/01 2:53 PM	EMAIL
058022FPMC000002	CR 01	3/15/01 12:09 PM	3/20/01 12:09 PM	4/3/01 1:46 PM	EMAIL
058031FPMC000001	CR 03	4/3/01 10:47 AM	4/6/01 10:47 AM	4/12/01 5:36 PM	EMAIL
058031FPMC000003	CR 02	4/3/01 9:55 AM	4/6/01 9:55 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000005	CR 02	4/3/01 10:21 AM	4/6/01 10:21 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000006	CR 02	4/3/01 10:31 AM	4/6/01 10:31 AM	4/11/01 4:47 PM	EMAIL
058031FPMC000007	VER 01 CR	4/10/01 3:08 PM	4/13/01 3:08 PM	4/17/01 4:45 PM	EMAIL
072131FPMC000027	VER 02 CR	6/22/01 11:42 AM	6/23/01 11:42 AM	6/28/01 9:46 AM	FAX
073051FPMC010027	VER 01 CR 01	6/18/01 5:33 PM	6/19/01 5:33 PM	6/21/01 3:08 PM	FAX
100012FPMC030001	REPON 3	7/12/01 6:05 PM	7/13/01 6:05 PM	7/16/01 8:35 AM	FAX

### Amended Exception:

*KPMG Consulting amended this exception prior to BellSouth response to the PONs listed above.*

### Background:

According to Ordering Measure O-9 of the Service Quality Measurement Plan<sup>2</sup>, BellSouth should return  $\geq 85\%$  of non-mechanized FOCs to Competitive Local Exchange Carriers (CLECs) within thirty-six (36) hours of receiving the Local Service Request (LSR). During the production test, KPMG Consulting received non-mechanized FOCs in greater than the thirty-six hour interval.

<sup>2</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

## FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90

**Issue:**

The following are the non-mechanized FOC timeliness results from March 13, 2001 through July 31, 2001.

ISSUE 1	<36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>=72 hrs	Total
Number of Transactions	136	9	10	38	193
Percent	70%	5%	5%	20%	100%

Following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within thirty-six hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	058031FPMC010002	00	9993	6/19/01 4:12 PM	7/30/01 3:12 PM
2	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
3	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
4	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
5	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
6	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	043021FPMC020001	00	9993	7/10/01 5:35 PM	7/24/01 2:48 PM
9	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	058022FPMC000001	01	9993	7/17/01 3:41 PM	7/30/01 3:12 PM
12	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
13	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
14	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
15	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
16	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
17	058031FPMC000001	00	9990	4/3/01 10:47 AM	4/12/01 5:36 PM
18	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 12:02 PM
19	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
20	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
21	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
22	035051FPMC010005	00	9990	6/19/01 4:10 PM	6/27/01 3:11 PM
23	058031FPMC000003	00	9990	4/3/01 9:55 AM	4/10/01 5:08 PM
24	058031FPMC000005	00	9990	4/3/01 10:21 AM	4/10/01 5:08 PM
25	058031FPMC000007	01	9990	4/10/01 3:08 PM	4/17/01 4:45 PM
26	042031FPMC000002	00	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
27	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
28	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
29	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
30	042031FPMC000004	00	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
31	042031FPMC000005	00	9990	7/18/01 4:53 PM	7/25/01 12:12 PM

## FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90

Item	PON	Ver	CC	LSR Sent	FOC Received
32	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
33	035081FPMC010002	00	9990	5/17/01 11:40 AM	5/22/01 3:06 PM
34	036021FPMC010003	01	9990	6/28/01 11:26 AM	7/3/01 12:01 PM
35	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
36	060011FPMC000002	04	9993	7/26/01 4:30 PM	7/30/01 3:16 PM
37	043021FPMC002001	01	9993	7/20/01 4:52 PM	7/24/01 2:45 PM
38	100012FPMC030001	00	9990	7/12/01 6:05 PM	7/16/01 8:35 AM
39	035051FPMC000003	00	9990	4/2/01 5:14 PM	4/5/01 9:35 AM
40	029021FPMC020003	04	9993	7/18/01 3:11 PM	7/20/01 8:10 PM
41	029021FPMC000005	02	9993	7/18/01 3:32 PM	7/20/01 8:14 PM
42	058031FPMC000011	01	9993	4/10/01 3:11 PM	4/12/01 6:17 PM
43	058031FPMC000010	01	9993	4/10/01 3:10 PM	4/12/01 6:13 PM
44	058031FPMC000009	01	9993	4/10/01 3:09 PM	4/12/01 6:10 PM
45	058031FPMC000008	01	9993	4/10/01 3:09 PM	4/12/01 6:05 PM
46	056012FPMC000011	01	9990	6/13/01 12:04 PM	6/15/01 2:58 PM
47	035051FPMC000004	00	9990	4/3/01 11:46 AM	4/5/01 2:16 PM
48	042031FPMC030001	03	9990	7/3/01 4:00 PM	7/5/01 6:01 PM
49	058031FPMC000004	00	9993	4/9/01 5:27 PM	4/11/01 4:47 PM
50	058031FPMC000006	00	9993	4/9/01 6:21 PM	4/11/01 4:47 PM
51	035051FPMC000002	00	9990	4/3/01 11:22 AM	4/5/01 9:46 AM
52	072131FPMC000027	02	9993	6/26/01 1:13 PM	6/28/01 9:46 AM
53	028011FPMC000004	01	9993	6/20/01 3:49 PM	6/22/01 11:25 AM
54	025011FPMC010006	00	9990	5/8/01 5:31 PM	5/10/01 12:40 PM
55	025011FPMC010004	00	9990	5/8/01 5:29 PM	5/10/01 12:05 PM
56	025011FPMC010005	00	9990	5/8/01 5:30 PM	5/10/01 12:00 PM
57	025011FPMC010002	00	9990	5/8/01 5:27 PM	5/10/01 11:05 AM

### Impact:

The receipt of timely FOCs is a critical factor in the CLEC's ability to deliver service to customers in a timely manner. Delays in the return of FOCs could have a negative impact on the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

### BellSouth's Response: (8/22 – response to amended exception)

BellSouth's findings are listed below by item number. All times listed are Central times.

Complex services ordered with a service inquiry are measured under 0-10 Service Inquiry with LSR Firm Order Confirmation Response Time Manual. It measures the interval and the percent within the interval from the submission of a Service Inquiry (SI) with Firm Order LSR to the distribution of a Firm Order Confirmation (FOC). It appears that KPMG failed to use the applicable SQM measure for services requiring a service inquiry processed in the CRS. The O-9 SQM measure does not apply to non-mechanized complex services requiring service inquiries.

## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90**

According to Ordering Measure O-9 Firm Order Confirmation Timeliness for the Service Quality Measurement Plan of BellSouth's OSS Testing Florida Interim Performance Metrics Version 3.0, it appears that KPMG failed to consider applicable exclusions in their calculation for the 36-hour interval for non-mechanized FOCs.

- Item 1: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 2: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 3: Agree with KPMG. UNE Combo BRI.
- Item 4: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 5: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 6: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 7: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 8: Agree with KPMG. Resale BRI.
- Item 9: Agree with KPMG. Resale BRI.
- Item 10: Agree with KPMG. UNE Combo BRI.
- Item 11: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 12: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 does not apply for this service.
- Item 13: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 14: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 15: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90**

- Item 16: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 17: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 18: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 19: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 20: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 21: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 22: Agree with KPMG. UNE Combo BRI.
- Item 23: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 24: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 25: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 26: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 27: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 28: Agree with KPMG. UNE Combo BRI.
- Item 29: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 30: Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.

## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90**

- Item 31: Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.
- Item 32: Agree with KPMG. UNE Combo BRI.
- Item 33: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 34: Do not agree. UNE Combo BRI. CRSG has no record of receipt on 06/28. LSR received 07/02 07:11. FOC sent 07/03 12:01.
- Item 35: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 36: Do not agree. DID order. Service Inquiry required. O-9 SQM does not apply.
- Item 37: Agree with KPMG. Resale BRI.
- Item 38: Do not agree. LSR received 07/13 08:48. FOC sent 07/16 08:33.
- Item 39: Do not agree with KPMG. UNE Combo BRI. LSR received 04/03 16:13. FOC sent 04/05 08:35.
- Item 40: Do not agree. LSR received 07/18 15:06. FOC sent 07/19 10:55.
- Item 41: Do not agree. LSR received 07/18 15:28. FOC sent 07/19 11:57.
- Item 42: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 43: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 44: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 45: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 46: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90**

Item 47: Do not agree. UNE Combo BRI. LSR received 04/03 10:45. FOC sent 04/05 01:16.

Item 48: Do not agree. Resale PRI. Service Inquiry required. O-9 does not apply.

Item 49: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 50: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 51: Do not agree. UNE Combo BRI. LSR received 04/03 13:06. FOC sent 04/05 07:52.

Item 52: Do not agree. UNE Combo BRI. LSR received 06/26 12:13.

Item 53: Do not agree. LSR received 06/20 15:46; FOC sent 06/22 11:20.

Item 54: Do not agree. LSR received 05/09 14:46; FOC sent 05/10 12:36.

Item 55: Do not agree. LSR received 05/09 14:36; FOC sent 5/10 12:02.

Item 56: Do not agree. LSR received date 05/09 14:40; FOC sent 5/10 11:56. 05/10/2001.

Item 57: Do not agree. LSR received date 05/09 14:28; FOC to customer 05/10 11:00.

### **Summary of FOC Timeliness Results – Non-Mechanized Firm Order Confirmations (FOCs):**

# of Transactions = 157      (36 PONS excluded – SQM O-9 does not apply)  
# Missed FOC      = 6  
# Met FOC      = 151  
% FOC Return      = 96.2%

### **BellSouth's Amended Response: (2<sup>nd</sup> response to amended exception)**

The SQM O-9 identified in this exception for Non-Mechanized LSRs applies to the LCSC as it specifically states in the Business Rules: "The elapsed time from receipt of a valid paper LSR (**date and time stamp of FAX or date and time paper LSRs received in LCSC**) until appropriate service orders are issued by a BellSouth service representative via Direct Order entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON."

## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90**

The SQM O-10 measure does not apply to the PONs issued to the CRSG in this exception. This SQM Level of Disaggregation is for xDSL (includes UNE unbundled ADSL, HDSL, and UNE Unbundled Copper Loops) and Unbundled Interoffice Transport.

The Products and Services Interval Guide provides the intervals for complex products and services that require service inquiries or provides additional time for technical direction or assistance from the CRSG/Account Team. The appropriate centers that Complex Resale LSRs should be submitted to are listed in the BBR-LO.

BellSouth's analysis of the 57 PONs KPMG identified in this exception indicates that only 4 should be measured under the SQM O-9 measure which applies to the LCSC. The remaining 53 were sent to the CRSG (SQM O-9 does not apply).

Listed below are BellSouth's findings and a summary of the results:

- |         |   |
|---------|---|
| Item 1: | Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG) |
| Item 2: | Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG) |
| Item 3: | Agree with KPMG. UNE Combo BRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)                         |
| Item 4: | Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG) |
| Item 5: | Agree with KPMG. UNE Combo PRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)                         |
| Item 6: | Agree with KPMG. UNE Combo PRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)                         |
| Item 7: | Agree with KPMG. UNE Combo PRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)                         |



## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90**

- Item 8: Agree with KPMG. Resale BRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 9: Agree with KPMG. Resale BRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 10: Agree with KPMG. UNE Combo BRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 11: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 12: Do not agree. UNE Combo PRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 13: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 14: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 15: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 16: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 17: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 18: Do not agree. Resale PRI. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 19: Do not agree. Resale PRI. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)

## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90**

- Item 20: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 21: Do not agree. Resale PRI. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 22: Agree with KPMG. UNE Combo BRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 23: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 24: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 25: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 26: Do not agree. Resale PRI. Service Inquiry required Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 27: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 28: Agree with KPMG. UNE Combo BRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 29: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 30: Do not agree. New Resale PRI order. Service inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)

## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90**

- Item 31: Do not agree. New Resale PRI order. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 32: Agree with KPMG. UNE Combo BRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 33: Do not agree. UNE Combo PRI. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 34: Do not agree. UNE Combo BRI. CRSG has no record of receipt on 06/28. LSR received 07/02 07:11. FOC sent 07/03 12:01. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 35: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 36: Do not agree. DID order. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 37: Agree with KPMG. Resale BRI. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 38: Do not agree. Loop. SQM O-9 applies. LSR received 07/13 08:48. FOC sent 07/16 08:33. (Center – LCSC)
- Item 39: Do not agree with KPMG. UNE Combo BRI. LSR received 04/03 16:13. FOC sent 04/05 08:35. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 40: Do not agree. Centrex Resale. LSR received 07/18 15:06. FOC sent 07:19 10:55. (According to the type of request, this product can be issued to the either CRSG or LCSC. (This change request- Center – LCSC)
- Item 41: Do not agree. Centrex Resale. LSR received 07/18 15:28. FOC sent 07/19 11:57. (According to the type of request, this product can be issued to the either CRSG or LCSC. (This change request- Center – LCSC)

## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90**

- Item 42: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 43: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 44: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 45: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 46: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 47: Do not agree. UNE Combo BRI. LSR received 04/03 10:45. FOC sent 04/05 01:16. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 48: Do not agree. Resale PRI. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 49: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 50: Do not agree. 56K Synchronet. Service Inquiry required. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 51: Do not agree. UNE Combo BRI. LSR received 04/03 13:06. FOC sent 04/05 07:52. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 52: Do not agree. UNE Combo BRI. LSR received 06/26 12:13. Product governed by Products & Services Interval Guide. SQM does not apply. (Center – CRSG)
- Item 53: Do not agree. Directory Listing. LSR received 06/20 15:46; FOC sent 06/22 11:20. (Center – LCSC)

## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED EXCEPTION 90**

- Item 54: Do not agree. Switch As Is Request - Centrex. LSR received 05/09 14:46; FOC sent 05/10 12:36. See Local Resale Assumption Agreements – Products & Services Interval Guide (Center – CRSG)
- Item 55: Do not agree. Switch As Is Request – Centrex. LSR received 05/09 14:36; FOC sent 5/10 12:02. See Local Resale Assumption Agreements – Products & Services Interval Guide (Center – CRSG)
- Item 56: Do not agree. Switch As Is Request – Centrex. LSR received date 05/09 14:40; FOC sent 5/10 11:56. 05/10/2001. See Local Resale Assumption Agreements – Products & Services Interval Guide (Center – CRSG)
- Item 57: Do not agree. Switch As Is Request – Centrex. LSR received date 05/09 14:28; FOC to customer 05/10 11:00. See Local Resale Assumption Agreements – Products & Services Interval Guide (Center – CRSG)

BellSouth's investigation found that 11 of the 53 PONs outside of the SM O-9 measure missed the intervals in the Products and Services Interval Guide.

### **Summary of FOC Timeliness Results – Non-Mechanized Firm Order Confirmations (FOCs):**

# of Transactions = 193  
# Missed FOC = 11  
# Met FOC = 182  
% FOC Return = 94.3%

31 PONs (56K Synchronet & Resale PRI) - require internal service inquiry - CRSG  
1 PON (DID) – require internal service inquiry- CRSG  
12 PONs (UNE Combo BRI & Resale BRI)– service inquiry not required - CRSG  
\*5 PONs (UNE Combo PRI) –service inquiry not required - CRSG  
2 PONs (Resale Centrex-change requests) – service inquiry not required - LCSC  
1 PON (Loop) – service inquiry not required- LCSC  
1 PON (Directory Listing) – service inquiry not required - LCSC  
4 PONs (Resale Centrex-Switch As Is) – service inquiry not required - CRSG

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57 PONS

\*The 5 UNE Combo PRIs were conversions from Resale to UNE and do not require service inquiries. However, all New “N” UNE Combo PRI requests require a service inquiry.

**FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO  
AMENDED EXCEPTION 90**

**SECOND AMENDED EXCEPTION 90**

BellSouth Florida OSS Testing Evaluation

Date: December 07, 2001

**EXCEPTION REPORT**

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV1).

**Exception:**

**KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and electronic mail. (TVV1)**

**Background:**

The Bell South Products & Service Interval Guide<sup>1</sup> states that BellSouth should return 85% of Non-Mechanized FOCs to Competitive Local Exchange Carriers (CLECs) within a defined interval for each product type.

**Issue:**

KPMG Consulting has received Non-Mechanized FOCs after the interval guide standard. The following are the Non-Mechanized FOC timeliness results as of July 16, 2001:

	On Time	Late	Total
Instances	128	31	159
Percentage	80%	20%	--

The following is a list of PONs that received Non-Mechanized FOCs after the interval guide standard

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
029021FPMC000004	VER 01 CR 01	7/13/01 1:28 PM	7/15/01 1:28 PM	7/16/01 9:10 AM	FAX

<sup>1</sup> BellSouth Products & Services Interval Guide – Issue 4a 2001  
KPMG Consulting, Inc.  
12/07/01  
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## SECOND AMENDED EXCEPTION 90

BellSouth Florida OSS Testing Evaluation

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
035051FPMC000003	00	4/2/01 5:14 PM	4/4/01 5:14 PM	4/5/01 9:35 AM	EMAIL
035051FPMC010005	CR 01	6/19/01 4:10 PM	6/21/01 4:10 PM	6/27/01 3:11 PM	EMAIL
035081FPMC010001	REPON 1	4/5/01 4:19 PM	4/10/01 4:19 PM	4/13/01 3:49 PM	EMAIL
035081FPMC010002	REPON 1	5/14/01 5:50 PM	5/17/01 5:50 PM	5/22/01 3:06 PM	EMAIL
035081FPMC000003	VER 01	5/7/01 5:00 PM	5/10/01 5:00 PM	5/21/01 1:38 PM	EMAIL
035081FPMC000004	00	5/4/01 1:46 PM	5/9/01 1:46 PM	5/22/01 3:08 PM	EMAIL
035081FPMC000006	00	5/4/01 1:48 PM	5/9/01 1:48 PM	5/23/01 9:26 AM	EMAIL
035081FPMC000007	00	5/4/01 1:49 PM	5/9/01 1:49 PM	5/18/01 2:15 PM	EMAIL
036021FPMC010003	VER 01 CR 01	6/28/01 11:26 AM	7/2/01 11:26 AM	7/3/01 12:01 PM	EMAIL
036021FPMC010004	VER 01 CR 01	7/6/01 5:01 PM	7/8/01 5:01 PM	7/9/01 3:46 PM	EMAIL
036121FPMC000002	00	6/13/01 5:22 PM	6/15/01 5:22 PM	6/27/01 10:54 AM	EMAIL
040061FPMC000003	VER 00 CR 01	5/18/01 3:06 PM	5/27/01 3:06 PM	6/8/01 3:06 PM	EMAIL
056012FPMC020001	REPON 2	5/24/01 9:42 AM	5/29/01 9:42 AM	6/1/01 3:17 PM	EMAIL
056012FPMC010003	VER 01 CR	4/12/01 4:27 PM	4/17/01 4:27 PM	4/23/01 2:54 PM	EMAIL
056012FPMC000006	VER 01 CR 01	6/4/01 6:10 PM	6/7/01 6:10 PM	6/8/01 5:51 PM	EMAIL
056012FPMC010007	CR 01	5/8/01 6:10 PM	5/7/01 3:44 PM	5/18/01 3:37 PM	EMAIL

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## SECOND AMENDED EXCEPTION 90

BellSouth Florida OSS Testing Evaluation

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
056012FPMC010008	CR 01	5/8/01 5:59 PM	5/11/01 5:59 PM	5/15/01 6:18 PM	EMAIL
056012FPMC000009	CR 02	4/3/01 12:18 PM	4/6/01 12:18 PM	4/13/01 4:24 PM	EMAIL
056012FPMC000010	00	5/24/01 3:40 PM	5/29/01 3:40 PM	6/15/01 2:57 PM	EMAIL
056012FPMC000013	00	5/7/01 12:23 PM	5/10/01 12:23 PM	5/17/01 3:49 PM	EMAIL
056012FPMC000014	00	5/4/01 4:06 PM	5/9/01 4:06 PM	5/11/01 2:53 PM	EMAIL
058022FPMC000002	CR 01	3/15/01 12:09 PM	3/20/01 12:09 PM	4/3/01 1:46 PM	EMAIL
058031FPMC000001	CR 03	4/3/01 10:47 AM	4/6/01 10:47 AM	4/12/01 5:36 PM	EMAIL
058031FPMC000003	CR 02	4/3/01 9:55 AM	4/6/01 9:55 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000005	CR 02	4/3/01 10:21 AM	4/6/01 10:21 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000006	CR 02	4/3/01 10:31 AM	4/6/01 10:31 AM	4/11/01 4:47 PM	EMAIL
058031FPMC000007	VER 01 CR	4/10/01 3:08 PM	4/13/01 3:08 PM	4/17/01 4:45 PM	EMAIL
072131FPMC000027	VER 02 CR	6/22/01 11:42 AM	6/23/01 11:42 AM	6/28/01 9:46 AM	FAX
073051FPMC010027	VER 01 CR 01	6/18/01 5:33 PM	6/19/01 5:33 PM	6/21/01 3:08 PM	FAX
100012FPMC030001	REPON 3	7/12/01 6:05 PM	7/13/01 6:05 PM	7/16/01 8:35 AM	FAX

## SECOND AMENDED EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

#### Amended Exception:

*KPMG Consulting amended this exception prior to BellSouth response to the PONs listed above.*

#### Background:

According to Ordering Measure O-9 of the Service Quality Measurement Plan<sup>2</sup>, BellSouth should return  $\geq 85\%$  of non-mechanized FOCs to CLECs within 36 hours of receiving the Local Service Request (LSR). During the production test, KPMG Consulting received non-mechanized FOCs after the 36 hour interval has elapsed.

#### Issue:

The following are the non-mechanized FOC timeliness results from March 13, 2001 through July 31, 2001.

ISSUE 1	<36 hrs	$\geq 36$ and <48 hrs	$\geq 48$ and <72 hrs	$\geq 72$ hrs	Total
Number of Transactions	136	9	10	38	193
Percent	70%	5%	5%	20%	100%

Following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within 36 hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	058031FPMC010002	00	9993	6/19/01 4:12 PM	7/30/01 3:12 PM
2	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
3	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
4	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM

<sup>2</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001  
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BellSouth Florida OSS Testing Evaluation

Item	PON	Ver	CC	LSR Sent	FOC Received
5	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
6	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	043021FPMC020001	00	9993	7/10/01 5:35 PM	7/24/01 2:48 PM
9	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	058022FPMC000001	01	9993	7/17/01 3:41 PM	7/30/01 3:12 PM
12	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
13	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
14	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
15	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
16	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
17	058031FPMC000001	00	9990	4/3/01 10:47 AM	4/12/01 5:36 PM
18	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 12:02 PM

## SECOND AMENDED EXCEPTION 90

BellSouth Florida OSS Testing Evaluation

Item	PON	Ver	CC	LSR Sent	FOC Received
19	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
20	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
21	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
22	035051FPMC010005	00	9990	6/19/01 4:10 PM	6/27/01 3:11 PM
23	058031FPMC000003	00	9990	4/3/01 9:55 AM	4/10/01 5:08 PM
24	058031FPMC000005	00	9990	4/3/01 10:21 AM	4/10/01 5:08 PM
25	058031FPMC000007	01	9990	4/10/01 3:08 PM	4/17/01 4:45 PM
26	042031FPMC000002	00	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
27	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
28	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
29	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
30	042031FPMC000004	00	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
31	042031FPMC000005	00	9990	7/18/01 4:53 PM	7/25/01 12:12 PM
32	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
33	035081FPMC010002	00	9990	5/17/01 11:40 AM	5/22/01 3:06 PM

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BellSouth Florida OSS Testing Evaluation

Item	PON	Ver	CC	LSR Sent	FOC Received
34	036021FPMC010003	01	9990	6/28/01 11:26 AM	7/3/01 12:01 PM
35	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
36	060011FPMC000002	04	9993	7/26/01 4:30 PM	7/30/01 3:16 PM
37	043021FPMC002001	01	9993	7/20/01 4:52 PM	7/24/01 2:45 PM
38	100012FPMC030001	00	9990	7/12/01 6:05 PM	7/16/01 8:35 AM
39	035051FPMC000003	00	9990	4/2/01 5:14 PM	4/5/01 9:35 AM
40	029021FPMC020003	04	9993	7/18/01 3:11 PM	7/20/01 8:10 PM
41	029021FPMC000005	02	9993	7/18/01 3:32 PM	7/20/01 8:14 PM
42	058031FPMC000011	01	9993	4/10/01 3:11 PM	4/12/01 6:17 PM
43	058031FPMC000010	01	9993	4/10/01 3:10 PM	4/12/01 6:13 PM
44	058031FPMC000009	01	9993	4/10/01 3:09 PM	4/12/01 6:10 PM
45	058031FPMC000008	01	9993	4/10/01 3:09 PM	4/12/01 6:05 PM
46	056012FPMC000011	01	9990	6/13/01 12:04 PM	6/15/01 2:58 PM
47	035051FPMC000004	00	9990	4/3/01 11:46 AM	4/5/01 2:16 PM
48	042031FPMC030001	03	9990	7/3/01 4:00 PM	7/5/01 6:01 PM

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### BellSouth Florida OSS Testing Evaluation

Item	PON	Ver	CC	LSR Sent	FOC Received
49	058031FPMC000004	00	9993	4/9/01 5:27 PM	4/11/01 4:47 PM
50	058031FPMC000006	00	9993	4/9/01 6:21 PM	4/11/01 4:47 PM
51	035051FPMC000002	00	9990	4/3/01 11:22 AM	4/5/01 9:46 AM
52	072131FPMC000027	02	9993	6/26/01 1:13 PM	6/28/01 9:46 AM
53	028011FPMC000004	01	9993	6/20/01 3:49 PM	6/22/01 11:25 AM
54	025011FPMC010006	00	9990	5/8/01 5:31 PM	5/10/01 12:40 PM
55	025011FPMC010004	00	9990	5/8/01 5:29 PM	5/10/01 12:05 PM
56	025011FPMC010005	00	9990	5/8/01 5:30 PM	5/10/01 12:00 PM
57	025011FPMC010002	00	9990	5/8/01 5:27 PM	5/10/01 11:05 AM

#### **BellSouth's Response:**

BellSouth's findings are listed below by item number. All times listed are Central times.

Complex services ordered with a service inquiry are measured under 0-10 Service Inquiry with LSR Firm Order Confirmation Response Time Manual. It measures the interval and the percent within the interval from the submission of a Service Inquiry (SI) with Firm Order LSR to the distribution of a Firm Order Confirmation (FOC). It appears that KPMG failed to use the applicable SQM measure for services requiring a service inquiry processed in the CRS. The O-9 SQM measure does not apply to non-mechanized complex services requiring service inquiries.

According to Ordering Measure O-9 Firm Order Confirmation Timeliness for the Service Quality Measurement Plan of BellSouth's OSS Testing Florida Interim Performance

## SECOND AMENDED EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

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Metrics Version 3.0, it appears that KPMG failed to consider applicable exclusions in their calculation for the 36-hour interval for non-mechanized FOCs.

- Item 1: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 2: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 3: Agree with KPMG. UNE Combo BRI.
- Item 4: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 5: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 6: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 7: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 8: Agree with KPMG. Resale BRI.
- Item 9: Agree with KPMG. Resale BRI.
- Item 10: Agree with KPMG. UNE Combo BRI.
- Item 11: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 12: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 does not apply for this service.
- Item 13: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 14: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 15: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 16: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 17: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 18: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 19: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 20: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 21: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.

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## SECOND AMENDED EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

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Item 22:	Agree with KPMG. UNE Combo BRI.
Item 23:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 24:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 25:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 26:	Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
Item 27:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 28:	Agree with KPMG. UNE Combo BRI.
Item 29:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 30:	Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.
Item 31:	Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.
Item 32:	Agree with KPMG. UNE Combo BRI.
Item 33:	Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
Item 34:	Do not agree. UNE Combo BRI. CRSB has no record of receipt on 06/28. LSR received 07/02 07:11. FOC sent 07/03 12:01.
Item 35:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 36:	Do not agree. DID order. Service Inquiry required. O-9 SQM does not apply.
Item 37:	Agree with KPMG. Resale BRI.
Item 38:	Do not agree. LSR received 07/13 08:48. FOC sent 07/16 08:33.
Item 39:	Do not agree with KPMG. UNE Combo BRI. LSR received 04/03 16:13. FOC sent 04/05 08:35.
Item 40:	Do not agree. LSR received 07/18 15:06. FOC sent 07/19 10:55.
Item 41:	Do not agree. LSR received 07/18 15:28. FOC sent 07/19 11:57.
Item 42:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 43:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 44:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 45:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.



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Item 46:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 47:	Do not agree. UNE Combo BRI. LSR received 04/03 10:45. FOC sent 04/05 01:16.
Item 48:	Do not agree. Resale PRI. Service Inquiry required. O-9 does not apply.
Item 49:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 50:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 51:	Do not agree. UNE Combo BRI. LSR received 04/03 13:06. FOC sent 04/05 07:52.
Item 52:	Do not agree. UNE Combo BRI. LSR received 06/26 12:13.
Item 53:	Do not agree. LSR received 06/20 15:46; FOC sent 06/22 11:20.
Item 54:	Do not agree. LSR received 05/09 14:46; FOC sent 05/10 12:36.
Item 55:	Do not agree. LSR received 05/09 14:36; FOC sent 5/10 12:02.
Item 56:	Do not agree. LSR received date 05/09 14:40; FOC sent 5/10 11:56. 05/10/2001.
Item 57:	Do not agree. LSR received date 05/09 14:28; FOC to customer 05/10 11:00.

#### Summary of FOC Timeliness Results – Non-Mechanized Firm Order Confirmations (FOCs):

# of Transactions = 157 (36 PONS excluded – SQM O-9 does not apply)  
# Missed FOCs = 6  
# Met FOCs = 151  
% FOCs Returned = 96.2%

#### 2<sup>nd</sup> Amended Issue:

In KPMG Consulting's professional opinion orders sent to the CRSB that do not require a service inquiry should be evaluated in a manner similar to O-9 of BellSouth's Service Quality Measurement Plan<sup>3</sup>. During the production test of non-mechanized orders, BellSouth returned 34% of FOCs in greater than a 36 hour time frame.

The following table contains the non-mechanized FOC timeliness results through December 5, 2001 for FOCs received via fax and electronic mail.

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<sup>3</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

## SECOND AMENDED EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

ISSUE 1	<36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>=72 hrs	Total
Number of Transactions	84	6	14	23	127
Percent	66%	5%	11%	18%	100%

The following is a list of PONs which did not receive non-mechanized FOCs from BellSouth within 36 hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	035051FPMC010005	00	9990	6/18/01 4:10 PM	6/27/01 3:11 PM
2	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
3	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
4	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
5	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
6	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
9	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
12	042031FPMC000002	01	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
13	042031FPMC000004	01	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
14	042031FPMC000005	01	9990	7/18/01 4:53 PM	7/25/01 12:12 PM

## SECOND AMENDED EXCEPTION 90

BellSouth Florida OSS Testing Evaluation

Item	PON	Ver	CC	LSR Sent	FOC Received
15	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 2:02 PM
16	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
17	051021FPMC001004	01	9990	11/14/01 12:30 PM	11/29/01 3:52 PM
18	051021FPMC000007	01	9990	11/14/01 12:30 PM	11/29/01 4:05 PM
19	051021FPMC010008	01	9990	11/14/01 12:26 PM	11/21/01 9:41 AM
20	051021FPMC000009	01	9990	11/8/01 3:07 PM	11/20/01 5:56 PM
21	051021FPMC010010	01	9990	11/14/01 12:26 PM	11/21/01 9:43 AM
22	051021FPMC000012	01	9990	11/8/01 3:07 PM	11/20/01 5:55 PM
23	051021FPMC000013	01	9990	11/13/01 8:24 PM	11/21/01 10:10 AM
24	051021FPMC010015	01	9990	11/13/01 8:27 PM	11/21/01 9:58 AM
25	051021FPMC000016	01	9990	11/14/01 9:15 PM	11/29/01 4:05 PM
26	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
28	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
29	056012FPMC020004	00	9990	8/3/01 10:23 AM	8/27/01 10:21 AM
30	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
31	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
32	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
33	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
34	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
35	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
36	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM

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**SECOND AMENDED EXCEPTION 90**

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Item	PON	Ver	CC	LSR Sent	FOC Received
37	058022FPMC000001	01 CR 02	9993	7/17/01 3:41 PM	7/30/01 3:12 PM
38	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
39	058031FPMC000001	00	9993	4/3/01 10:47 AM	4/12/01 5:36 PM
40	058031FPMC000003	00	9993	4/3/01 9:55 AM	4/10/01 5:08 PM
41	058031FPMC000005	00	9993	4/3/01 10:21 AM	4/10/01 5:08 PM
42	058031FPMC000007	01	9993	4/10/01 3:08 PM	4/17/01 4:45 PM
43	060011FPMC000006	00 CR 01	9993	8/6/01 5:15 PM	8/20/01 9:54 AM
44	060011FPMC000008	00 CR 01	9993	8/6/01 5:15 PM	8/20/01 9:56 AM

**Impact:**

The receipt of timely FOCs is critical to the CLEC's ability to deliver service to customers in a timely manner. Delays in the return of FOCs could negatively impact the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

**SECOND AMENDED EXCEPTION 90**

BellSouth Florida OSS Testing Evaluation

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Date: December 07, 2001**EXCEPTION REPORT**

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV1).

**Exception:**

**KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and electronic mail. (TVV1)**

**Background:**

The Bell South Products & Service Interval Guide<sup>1</sup> states that BellSouth should return 85% of Non-Mechanized FOCs to Competitive Local Exchange Carriers (CLECs) within a defined interval for each product type.

**Issue:**

KPMG Consulting has received Non-Mechanized FOCs after the interval guide standard. The following are the Non-Mechanized FOC timeliness results as of July 16, 2001:

	On Time	Late	Total
Instances	128	31	159
Percentage	80%	20%	--

The following is a list of PONs that received Non-Mechanized FOCs after the interval guide standard

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
029021FPMC000004	VER 01 CR 01	7/13/01 1:28 PM	7/15/01 1:28 PM	7/16/01 9:10 AM	FAX

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<sup>1</sup> BellSouth Products & Services Interval Guide – Issue 4a 2001  
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PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
035051FPMC000003	00	4/2/01 5:14 PM	4/4/01 5:14 PM	4/5/01 9:35 AM	EMAIL
035051FPMC010005	CR 01	6/19/01 4:10 PM	6/21/01 4:10 PM	6/27/01 3:11 PM	EMAIL
035081FPMC010001	REPON 1	4/5/01 4:19 PM	4/10/01 4:19 PM	4/13/01 3:49 PM	EMAIL
035081FPMC010002	REPON 1	5/14/01 5:50 PM	5/17/01 5:50 PM	5/22/01 3:06 PM	EMAIL
035081FPMC000003	VER 01	5/7/01 5:00 PM	5/10/01 5:00 PM	5/21/01 1:38 PM	EMAIL
035081FPMC000004	00	5/4/01 1:46 PM	5/9/01 1:46 PM	5/22/01 3:08 PM	EMAIL
035081FPMC000006	00	5/4/01 1:48 PM	5/9/01 1:48 PM	5/23/01 9:26 AM	EMAIL
035081FPMC000007	00	5/4/01 1:49 PM	5/9/01 1:49 PM	5/18/01 2:15 PM	EMAIL
036021FPMC010003	VER 01 CR 01	6/28/01 11:26 AM	7/2/01 11:26 AM	7/3/01 12:01 PM	EMAIL
036021FPMC010004	VER 01 CR 01	7/6/01 5:01 PM	7/8/01 5:01 PM	7/9/01 3:46 PM	EMAIL
036121FPMC000002	00	6/13/01 5:22 PM	6/15/01 5:22 PM	6/27/01 10:54 AM	EMAIL
040061FPMC000003	VER 00 CR 01	5/18/01 3:06 PM	5/27/01 3:06 PM	6/8/01 3:06 PM	EMAIL
056012FPMC020001	REPON 2	5/24/01 9:42 AM	5/29/01 9:42 AM	6/1/01 3:17 PM	EMAIL
056012FPMC010003	VER 01 CR	4/12/01 4:27 PM	4/17/01 4:27 PM	4/23/01 2:54 PM	EMAIL
056012FPMC000006	VER 01 CR 01	6/4/01 6:10 PM	6/7/01 6:10 PM	6/8/01 5:51 PM	EMAIL
056012FPMC010007	CR 01	5/8/01 6:10 PM	5/7/01 3:44 PM	5/18/01 3:37 PM	EMAIL

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## SECOND AMENDED EXCEPTION 90

BellSouth Florida OSS Testing Evaluation

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
056012FPMC010008	CR 01	5/8/01 5:59 PM	5/11/01 5:59 PM	5/15/01 6:18 PM	EMAIL
056012FPMC000009	CR 02	4/3/01 12:18 PM	4/6/01 12:18 PM	4/13/01 4:24 PM	EMAIL
056012FPMC000010	00	5/24/01 3:40 PM	5/29/01 3:40 PM	6/15/01 2:57 PM	EMAIL
056012FPMC000013	00	5/7/01 12:23 PM	5/10/01 12:23 PM	5/17/01 3:49 PM	EMAIL
056012FPMC000014	00	5/4/01 4:06 PM	5/9/01 4:06 PM	5/11/01 2:53 PM	EMAIL
058022FPMC000002	CR 01	3/15/01 12:09 PM	3/20/01 12:09 PM	4/3/01 1:46 PM	EMAIL
058031FPMC000001	CR 03	4/3/01 10:47 AM	4/6/01 10:47 AM	4/12/01 5:36 PM	EMAIL
058031FPMC000003	CR 02	4/3/01 9:55 AM	4/6/01 9:55 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000005	CR 02	4/3/01 10:21 AM	4/6/01 10:21 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000006	CR 02	4/3/01 10:31 AM	4/6/01 10:31 AM	4/11/01 4:47 PM	EMAIL
058031FPMC000007	VER 01 CR	4/10/01 3:08 PM	4/13/01 3:08 PM	4/17/01 4:45 PM	EMAIL
072131FPMC000027	VER 02 CR	6/22/01 11:42 AM	6/23/01 11:42 AM	6/28/01 9:46 AM	FAX
073051FPMC010027	VER 01 CR 01	6/18/01 5:33 PM	6/19/01 5:33 PM	6/21/01 3:08 PM	FAX
100012FPMC030001	REPO 3	7/12/01 6:05 PM	7/13/01 6:05 PM	7/16/01 8:35 AM	FAX

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## SECOND AMENDED EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

#### Amended Exception:

*KPMG Consulting amended this exception prior to BellSouth response to the PONs listed above.*

#### Background:

According to Ordering Measure O-9 of the Service Quality Measurement Plan<sup>2</sup>, BellSouth should return  $\geq 85\%$  of non-mechanized FOCs to CLECs within 36 hours of receiving the Local Service Request (LSR). During the production test, KPMG Consulting received non-mechanized FOCs after the 36 hour interval has elapsed.

#### Issue:

The following are the non-mechanized FOC timeliness results from March 13, 2001 through July 31, 2001.

ISSUE 1	<36 hrs	$\geq 36$ and <48 hrs	$\geq 48$ and <72 hrs	$\geq 72$ hrs	Total
Number of Transactions	136	9	10	38	193
Percent	70%	5%	5%	20%	100%

Following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within 36 hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	058031FPMC010002	00	9993	6/19/01 4:12 PM	7/30/01 3:12 PM
2	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
3	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
4	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM

<sup>2</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001  
KPMG Consulting, Inc.



## SECOND AMENDED EXCEPTION 90

BellSouth Florida OSS Testing Evaluation

Item	PON	Ver	CC	LSR Sent	FOC Received
5	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
6	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	043021FPMC020001	00	9993	7/10/01 5:35 PM	7/24/01 2:48 PM
9	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	058022FPMC000001	01	9993	7/17/01 3:41 PM	7/30/01 3:12 PM
12	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
13	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
14	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
15	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
16	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
17	058031FPMC000001	00	9990	4/3/01 10:47 AM	4/12/01 5:36 PM
18	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 12:02 PM

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## SECOND AMENDED EXCEPTION 90

BellSouth Florida OSS Testing Evaluation

Item	PON	Ver	CC	LSR Sent	FOC Received
19	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
20	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
21	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
22	035051FPMC010005	00	9990	6/19/01 4:10 PM	6/27/01 3:11 PM
23	058031FPMC000003	00	9990	4/3/01 9:55 AM	4/10/01 5:08 PM
24	058031FPMC000005	00	9990	4/3/01 10:21 AM	4/10/01 5:08 PM
25	058031FPMC000007	01	9990	4/10/01 3:08 PM	4/17/01 4:45 PM
26	042031FPMC000002	00	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
27	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
28	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
29	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
30	042031FPMC000004	00	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
31	042031FPMC000005	00	9990	7/18/01 4:53 PM	7/25/01 12:12 PM
32	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
33	035081FPMC010002	00	9990	5/17/01 11:40 AM	5/22/01 3:06 PM

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## SECOND AMENDED EXCEPTION 90

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Item	PON	Ver	CC	LSR Sent	FOC Received
34	036021FPMC010003	01	9990	6/28/01 11:26 AM	7/3/01 12:01 PM
35	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
36	060011FPMC000002	04	9993	7/26/01 4:30 PM	7/30/01 3:16 PM
37	043021FPMC002001	01	9993	7/20/01 4:52 PM	7/24/01 2:45 PM
38	100012FPMC030001	00	9990	7/12/01 6:05 PM	7/16/01 8:35 AM
39	035051FPMC000003	00	9990	4/2/01 5:14 PM	4/5/01 9:35 AM
40	029021FPMC020003	04	9993	7/18/01 3:11 PM	7/20/01 8:10 PM
41	029021FPMC000005	02	9993	7/18/01 3:32 PM	7/20/01 8:14 PM
42	058031FPMC000011	01	9993	4/10/01 3:11 PM	4/12/01 6:17 PM
43	058031FPMC000010	01	9993	4/10/01 3:10 PM	4/12/01 6:13 PM
44	058031FPMC000009	01	9993	4/10/01 3:09 PM	4/12/01 6:10 PM
45	058031FPMC000008	01	9993	4/10/01 3:09 PM	4/12/01 6:05 PM
46	056012FPMC000011	01	9990	6/13/01 12:04 PM	6/15/01 2:58 PM
47	035051FPMC000004	00	9990	4/3/01 11:46 AM	4/5/01 2:16 PM
48	042031FPMC030001	03	9990	7/3/01 4:00 PM	7/5/01 6:01 PM

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### BellSouth Florida OSS Testing Evaluation

Item	PON	Ver	CC	LSR Sent	FOC Received
49	058031FPMC000004	00	9993	4/9/01 5:27 PM	4/11/01 4:47 PM
50	058031FPMC000006	00	9993	4/9/01 6:21 PM	4/11/01 4:47 PM
51	035051FPMC000002	00	9990	4/3/01 11:22 AM	4/5/01 9:46 AM
52	072131FPMC000027	02	9993	6/26/01 1:13 PM	6/28/01 9:46 AM
53	028011FPMC000004	01	9993	6/20/01 3:49 PM	6/22/01 11:25 AM
54	025011FPMC010006	00	9990	5/8/01 5:31 PM	5/10/01 12:40 PM
55	025011FPMC010004	00	9990	5/8/01 5:29 PM	5/10/01 12:05 PM
56	025011FPMC010005	00	9990	5/8/01 5:30 PM	5/10/01 12:00 PM
57	025011FPMC010002	00	9990	5/8/01 5:27 PM	5/10/01 11:05 AM

#### BellSouth's Response:

BellSouth's findings are listed below by item number. All times listed are Central times.

Complex services ordered with a service inquiry are measured under 0-10 Service Inquiry with LSR Firm Order Confirmation Response Time Manual. It measures the interval and the percent within the interval from the submission of a Service Inquiry (SI) with Firm Order LSR to the distribution of a Firm Order Confirmation (FOC). It appears that KPMG failed to use the applicable SQM measure for services requiring a service inquiry processed in the CRS. The O-9 SQM measure does not apply to non-mechanized complex services requiring service inquiries.

According to Ordering Measure O-9 Firm Order Confirmation Timeliness for the Service Quality Measurement Plan of BellSouth's OSS Testing Florida Interim Performance

## SECOND AMENDED EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

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Metrics Version 3.0, it appears that KPMG failed to consider applicable exclusions in their calculation for the 36-hour interval for non-mechanized FOCs.

- Item 1: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 2: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 3: Agree with KPMG. UNE Combo BRI.
- Item 4: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 5: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 6: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 7: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 8: Agree with KPMG. Resale BRI.
- Item 9: Agree with KPMG. Resale BRI.
- Item 10: Agree with KPMG. UNE Combo BRI.
- Item 11: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 12: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 does not apply for this service.
- Item 13: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 14: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 15: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 16: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 17: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 18: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 19: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 20: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 21: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.

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### BellSouth Florida OSS Testing Evaluation

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Item 22:	Agree with KPMG. UNE Combo BRI.
Item 23:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 24:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 25:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 26:	Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
Item 27:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 28:	Agree with KPMG. UNE Combo BRI.
Item 29:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 30:	Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.
Item 31:	Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.
Item 32:	Agree with KPMG. UNE Combo BRI.
Item 33:	Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
Item 34:	Do not agree. UNE Combo BRI. CRSB has no record of receipt on 06/28. LSR received 07/02 07:11. FOC sent 07/03 12:01.
Item 35:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 36:	Do not agree. DID order. Service Inquiry required. O-9 SQM does not apply.
Item 37:	Agree with KPMG. Resale BRI.
Item 38:	Do not agree. LSR received 07/13 08:48. FOC sent 07/16 08:33.
Item 39:	Do not agree with KPMG. UNE Combo BRI. LSR received 04/03 16:13. FOC sent 04/05 08:35.
Item 40:	Do not agree. LSR received 07/18 15:06. FOC sent 07:19 10:55.
Item 41:	Do not agree. LSR received 07/18 15:28. FOC sent 07/19 11:57.
Item 42:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 43:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 44:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 45:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

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### BellSouth Florida OSS Testing Evaluation

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Item 46:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 47:	Do not agree. UNE Combo BRI. LSR received 04/03 10:45. FOC sent 04/05 01:16.
Item 48:	Do not agree. Resale PRI. Service Inquiry required. O-9 does not apply.
Item 49:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 50:	Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
Item 51:	Do not agree. UNE Combo BRI. LSR received 04/03 13:06. FOC sent 04/05 07:52.
Item 52:	Do not agree. UNE Combo BRI. LSR received 06/26 12:13.
Item 53:	Do not agree. LSR received 06/20 15:46; FOC sent 06/22 11:20.
Item 54:	Do not agree. LSR received 05/09 14:46; FOC sent 05/10 12:36.
Item 55:	Do not agree. LSR received 05/09 14:36; FOC sent 5/10 12:02.
Item 56:	Do not agree. LSR received date 05/09 14:40; FOC sent 5/10 11:56. 05/10/2001.
Item 57:	Do not agree. LSR received date 05/09 14:28; FOC to customer 05/10 11:00.

#### Summary of FOC Timeliness Results – Non-Mechanized Firm Order Confirmations (FOCs):

# of Transactions = 157 (36 PONS excluded – SQM O-9 does not apply)  
# Missed FOCs = 6  
# Met FOCs = 151  
% FOCs Returned = 96.2%

#### 2<sup>nd</sup> Amended Issue:

In KPMG Consulting's professional opinion orders sent to the CRSG that do not require a service inquiry should be evaluated in a manner similar to O-9 of BellSouth's Service Quality Measurement Plan<sup>3</sup>. During the production test of non-mechanized orders, BellSouth returned 34% of FOCs in greater than a 36 hour time frame.

The following table contains the non-mechanized FOC timeliness results through December 5, 2001 for FOCs received via fax and electronic mail.

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<sup>3</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001  
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## SECOND AMENDED EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

ISSUE 1	<36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>=72 hrs	Total
Number of Transactions	84	6	14	23	127
Percent	66%	5%	11%	18%	100%

The following is a list of PONs which did not receive non-mechanized FOCs from BellSouth within 36 hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	035051FPMC010005	00	9990	6/18/01 4:10 PM	6/27/01 3:11 PM
2	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
3	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
4	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
5	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
6	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
9	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
12	042031FPMC000002	01	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
13	042031FPMC000004	01	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
14	042031FPMC000005	01	9990	7/18/01 4:53 PM	7/25/01 12:12 PM



## SECOND AMENDED EXCEPTION 90

BellSouth Florida OSS Testing Evaluation

Item	PON	Ver	CC	LSR Sent	FOC Received
15	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 2:02 PM
16	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
17	051021FPMC001004	01	9990	11/14/01 12:30 PM	11/29/01 3:52 PM
18	051021FPMC000007	01	9990	11/14/01 12:30 PM	11/29/01 4:05 PM
19	051021FPMC010008	01	9990	11/14/01 12:26 PM	11/21/01 9:41 AM
20	051021FPMC000009	01	9990	11/8/01 3:07 PM	11/20/01 5:56 PM
21	051021FPMC010010	01	9990	11/14/01 12:26 PM	11/21/01 9:43 AM
22	051021FPMC000012	01	9990	11/8/01 3:07 PM	11/20/01 5:55 PM
23	051021FPMC000013	01	9990	11/13/01 8:24 PM	11/21/01 10:10 AM
24	051021FPMC010015	01	9990	11/13/01 8:27 PM	11/21/01 9:58 AM
25	051021FPMC000016	01	9990	11/14/01 9:15 PM	11/29/01 4:05 PM
26	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
28	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
29	056012FPMC020004	00	9990	8/3/01 10:23 AM	8/27/01 10:21 AM
30	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
31	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
32	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
33	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
34	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
35	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
36	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM

## SECOND AMENDED EXCEPTION 90

### BellSouth Florida OSS Testing Evaluation

Item	PON	Ver	CC	LSR Sent	FOC Received
37	058022FPMC000001	01 CR 02	9993	7/17/01 3:41 PM	7/30/01 3:12 PM
38	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
39	058031FPMC000001	00	9993	4/3/01 10:47 AM	4/12/01 5:36 PM
40	058031FPMC000003	00	9993	4/3/01 9:55 AM	4/10/01 5:08 PM
41	058031FPMC000005	00	9993	4/3/01 10:21 AM	4/10/01 5:08 PM
42	058031FPMC000007	01	9993	4/10/01 3:08 PM	4/17/01 4:45 PM
43	060011FPMC000006	00 CR 01	9993	8/6/01 5:15 PM	8/20/01 9:54 AM
44	060011FPMC000008	00 CR 01	9993	8/6/01 5:15 PM	8/20/01 9:56 AM

#### Impact:

The receipt of timely FOCs is critical to the CLEC's ability to deliver service to customers in a timely manner. Delays in the return of FOCs could negatively impact the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

# FLORIDA OSS BELLSOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90



Florida OSS Test  
Second Amended Exception #90

Date: December 12, 2001

## EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV1).

### Exception:

**KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and electronic mail. (TVV1)**

### Background:

The Bell South Products & Service Interval Guide<sup>1</sup> states that BellSouth should return 85% of Non-Mechanized FOCs to Competitive Local Exchange Carriers (CLECs) within a defined interval for each product type.

### Issue:

KPMG Consulting has received Non-Mechanized FOCs after the interval guide standard. The following are the Non-Mechanized FOC timeliness results as of July 16, 2001:

	On Time	Late	Total
<b>Instances</b>	128	31	159
<b>Percentage</b>	80%	20%	--

The following is a list of PONs that received Non-Mechanized FOCs after the interval guide standard.

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
029021FPMC000004	VER 01 CR 01	7/13/01 1:28 PM	7/15/01 1:28 PM	7/16/01 9:10 AM	FAX
035051FPMC000003	00	4/2/01 5:14 PM	4/4/01 5:14 PM	4/5/01 9:35 AM	EMAIL

<sup>1</sup> BellSouth Products & Services Interval Guide – Issue 4a 2001

## FLORIDA OSS BELLSOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90

035051FPMC010005	CR 01	6/19/01 4:10 PM	6/21/01 4:10 PM	6/27/01 3:11 PM	EMAIL
035081FPMC010001	REPON 1	4/5/01 4:19 PM	4/10/01 4:19 PM	4/13/01 3:49 PM	EMAIL
035081FPMC010002	REPON 1	5/14/01 5:50 PM	5/17/01 5:50 PM	5/22/01 3:06 PM	EMAIL
035081FPMC000003	VER 01	5/7/01 5:00 PM	5/10/01 5:00 PM	5/21/01 1:38 PM	EMAIL
035081FPMC000004	00	5/4/01 1:46 PM	5/9/01 1:46 PM	5/22/01 3:08 PM	EMAIL
035081FPMC000006	00	5/4/01 1:48 PM	5/9/01 1:48 PM	5/23/01 9:26 AM	EMAIL
035081FPMC000007	00	5/4/01 1:49 PM	5/9/01 1:49 PM	5/18/01 2:15 PM	EMAIL
036021FPMC010003	VER 01 CR 01	6/28/01 11:26 AM	7/2/01 11:26 AM	7/3/01 12:01 PM	EMAIL
036021FPMC010004	VER 01 CR 01	7/6/01 5:01 PM	7/8/01 5:01 PM	7/9/01 3:46 PM	EMAIL
036121FPMC000002	00	6/13/01 5:22 PM	6/15/01 5:22 PM	6/27/01 10:54 AM	EMAIL
040061FPMC000003	VER 00 CR 01	5/18/01 3:06 PM	5/27/01 3:06 PM	6/8/01 3:06 PM	EMAIL
056012FPMC020001	REPON 2	5/24/01 9:42 AM	5/29/01 9:42 AM	6/1/01 3:17 PM	EMAIL
056012FPMC010003	VER 01 CR	4/12/01 4:27 PM	4/17/01 4:27 PM	4/23/01 2:54 PM	EMAIL
056012FPMC000006	VER 01 CR 01	6/4/01 6:10 PM	6/7/01 6:10 PM	6/8/01 5:51 PM	EMAIL
056012FPMC010007	CR 01	5/8/01 6:10 PM	5/7/01 3:44 PM	5/18/01 3:37 PM	EMAIL
056012FPMC010008	CR 01	5/8/01 5:59 PM	5/11/01 5:59 PM	5/15/01 6:18 PM	EMAIL
056012FPMC000009	CR 02	4/3/01 12:18 PM	4/6/01 12:18 PM	4/13/01 4:24 PM	EMAIL
056012FPMC000010	00	5/24/01 3:40 PM	5/29/01 3:40 PM	6/15/01 2:57 PM	EMAIL
056012FPMC000013	00	5/7/01 12:23 PM	5/10/01 12:23 PM	5/17/01 3:49 PM	EMAIL
056012FPMC000014	00	5/4/01 4:06 PM	5/9/01 4:06 PM	5/11/01 2:53 PM	EMAIL
058022FPMC000002	CR 01	3/15/01 12:09 PM	3/20/01 12:09 PM	4/3/01 1:46 PM	EMAIL
058031FPMC000001	CR 03	4/3/01 10:47 AM	4/6/01 10:47 AM	4/12/01 5:36 PM	EMAIL
058031FPMC000003	CR 02	4/3/01 9:55 AM	4/6/01 9:55 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000005	CR 02	4/3/01 10:21 AM	4/6/01 10:21 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000006	CR 02	4/3/01 10:31 AM	4/6/01 10:31 AM	4/11/01 4:47 PM	EMAIL

## FLORIDA OSS BELL SOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90

058031FPMC000007	VER 01 CR	4/10/01 3:08 PM	4/13/01 3:08 PM	4/17/01 4:45 PM	EMAIL
072131FPMC000027	VER 02 CR	6/22/01 11:42 AM	6/23/01 11:42 AM	6/28/01 9:46 AM	FAX
073051FPMC010027	VER 01 CR 01	6/18/01 5:33 PM	6/19/01 5:33 PM	6/21/01 3:08 PM	FAX
100012FPMC030001	REPO N 3	7/12/01 6:05 PM	7/13/01 6:05 PM	7/16/01 8:35 AM	FAX

### Amended Exception:

*KPMG Consulting amended this exception prior to BellSouth response to the PONs listed above.*

### Background:

According to Ordering Measure O-9 of the Service Quality Measurement Plan <sup>2</sup>, BellSouth should return  $\geq 85\%$  of non-mechanized FOCs to CLECs within 36 hours of receiving the Local Service Request (LSR). During the production test, KPMG Consulting received non-mechanized FOCs after the 36 hour interval has elapsed.

### Issue:

The following are the non-mechanized FOC timeliness results from March 13, 2001 through July 31, 2001.

ISSUE 1	<36 hrs	$\geq 36$ and <48 hrs	$\geq 48$ and <72 hrs	$\geq 72$ hrs	Total
Number of Transactions	136	9	10	38	193
Percent	70%	5%	5%	20%	100%

Following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within 36 hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	058031FPMC010002	00	9993	6/19/01 4:12 PM	7/30/01 3:12 PM
2	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
3	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
4	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
5	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM

<sup>2</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

## FLORIDA OSS BELLSOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90

6	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	043021FPMC020001	00	9993	7/10/01 5:35 PM	7/24/01 2:48 PM
9	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	058022FPMC000001	01	9993	7/17/01 3:41 PM	7/30/01 3:12 PM
12	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
13	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
14	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
15	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
16	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
17	058031FPMC000001	00	9990	4/3/01 10:47 AM	4/12/01 5:36 PM
18	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 12:02 PM
19	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
20	056012FPMC020001	00	9990	5/24/01 9:4 2 AM	6/1/01 3:17 PM
21	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
22	035051FPMC010005	00	9990	6/19/01 4:10 PM	6/27/01 3:11 PM
23	058031FPMC000003	00	9990	4/3/01 9:55 AM	4/10/01 5:08 PM
24	058031FPMC000005	00	9990	4/3/01 10:21 AM	4/10/01 5:08 PM
25	058031FPMC000007	01	9990	4/10/01 3:08 PM	4/17/01 4:45 PM
26	042031FPMC000002	00	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
27	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
28	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
29	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
30	042031FPMC000004	00	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
31	042031FPMC000005	00	9990	7/18/01 4:53 PM	7/25/01 12:12 PM

## FLORIDA OSS BELLSOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90

32	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
33	035081FPMC010002	00	9990	5/17/01 11:40 AM	5/22/01 3:06 PM
34	036021FPMC010003	01	9990	6/28/01 11:26 AM	7/3/01 12:01 PM
35	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
36	060011FPMC000002	04	9993	7/26/01 4:30 PM	7/30/01 3:16 PM
37	043021FPMC002001	01	9993	7/20/01 4:52 PM	7/24/01 2:45 PM
38	100012FPMC030001	00	9990	7/12/01 6:05 PM	7/16/01 8:35 AM
39	035051FPMC000003	00	9990	4/2/01 5:14 PM	4/5/01 9:35 AM
40	029021FPMC020003	04	9993	7/18/01 3:11 PM	7/20/01 8:10 PM
41	029021FPMC000005	02	9993	7/18/01 3:32 PM	7/20/01 8:14 PM
42	058031FPMC000011	01	9993	4/10/01 3:11 PM	4/12/01 6:17 PM
43	058031FPMC000010	01	9993	4/10/01 3:10 PM	4/12/01 6:13 PM
44	058031FPMC000009	01	9993	4/10/01 3:09 PM	4/12/01 6:10 PM
45	058031FPMC000008	01	9993	4/10/01 3:09 PM	4/12/01 6:05 PM
46	056012FPMC000011	01	9990	6/13/01 12:04 PM	6/15/01 2:58 PM
47	035051FPMC000004	00	9990	4/3/01 11:46 AM	4/5/01 2:16 PM
48	042031FPMC030001	03	9990	7/3/01 4:00 PM	7/5/01 6:01 PM
49	058031FPMC000004	00	9993	4/9/01 5:27 PM	4/11/01 4:47 PM
50	058031FPMC000006	00	9993	4/9/01 6:21 PM	4/11/01 4:47 PM
51	035051FPMC000002	00	9990	4/3/01 11:22 AM	4/5/01 9:46 AM
52	072131FPMC000027	02	9993	6/26/01 1:13 PM	6/28/01 9:46 AM
53	028011FPMC000004	01	9993	6/20/01 3:49 PM	6/22/01 11:25 AM
54	025011FPMC010006	00	9990	5/8/01 5:31 PM	5/10/01 12:40 PM
55	025011FPMC010004	00	9990	5/8/01 5:29 PM	5/10/01 12:05 PM
56	025011FPMC010005	00	9990	5/8/01 5:30 PM	5/10/01 12:00 PM
57	025011FPMC010002	00	9990	5/8/01 5:27 PM	5/10/01 11:05 AM

## **FLORIDA OSS BELL SOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90**

### **BellSouth's Response:**

BellSouth's findings are listed below by item number. All times listed are Central times.

Complex services ordered with a service inquiry are measured under 0-10 Service Inquiry with LSR Firm Order Confirmation Response Time Manual. It measures the interval and the percent within the interval from the submission of a Service Inquiry (SI) with Firm Order LSR to the distribution of a Firm Order Confirmation (FOC). It appears that KPMG failed to use the applicable SQM measure for services requiring a service inquiry processed in the CRSG. The O-9 SQM measure does not apply to non-mechanized complex services requiring service inquiries.

According to Ordering Measure O-9 Firm Order Confirmation Timeliness for the Service Quality Measurement Plan of BellSouth's OSS Testing Florida Interim Performance Metrics Version 3.0, it appears that KPMG failed to consider applicable exclusions in their calculation for the 36-hour interval for non-mechanized FOCs.

Item 1: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 2: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 3: Agree with KPMG. UNE Combo BRI.

Item 4: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 5: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.

Item 6: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.

Item 7: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.

Item 8: Agree with KPMG. Resale BRI.

Item 9: Agree with KPMG. Resale BRI.

Item 10: Agree with KPMG. UNE Combo BRI.

Item 11: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.

Item 12: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 does not apply for this service.

Item 13: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 14: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.

Item 15: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 16: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.



## **FLORIDA OSS BELL SOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90**

Item 17: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 18: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.

Item 19: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.

Item 20: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 21: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.

Item 22: Agree with KPMG. UNE Combo BRI.

Item 23: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 24: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 25: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 26: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.

Item 27: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 28: Agree with KPMG. UNE Combo BRI.

Item 29: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 30: Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.

Item 31: Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.

Item 32: Agree with KPMG. UNE Combo BRI.

Item 33: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.

Item 34: Do not agree. UNE Combo BRI. CRSG has no record of receipt on 06/28. LSR received 07/02 07:11. FOC sent 07/03 12:01.

Item 35: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

Item 36: Do not agree. DID order. Service Inquiry required. O-9 SQM does not apply.

Item 37: Agree with KPMG. Resale BRI.

Item 38: Do not agree. LSR received 07/13 08:48. FOC sent 07/16 08:33.

Item 39: Do not agree with KPMG. UNE Combo BRI. LSR received 04/03 16:13. FOC sent 04/05 08:35.

Item 40: Do not agree. LSR received 07/18 15:06. FOC sent 07/19 10:55.

Item 41: Do not agree. LSR received 07/18 15:28. FOC sent 07/19 11:57.

Item 42: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.

## **FLORIDA OSS BELLSOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90**

Item 43: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.  
Item 44: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.  
Item 45: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.  
Item 46: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.  
Item 47: Do not agree. UNE Combo BRI. LSR received 04/03 10:45. FOC sent 04/05 01:16.  
Item 48: Do not agree. Resale PRI. Service Inquiry required. O-9 does not apply.  
Item 49: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.  
Item 50: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.  
Item 51: Do not agree. UNE Combo BRI. LSR received 04/03 13:06. FOC sent 04/05 07:52.  
Item 52: Do not agree. UNE Combo BRI. LSR received 06/26 12:13.  
Item 53: Do not agree. LSR received 06/20 15:46; FOC sent 06/22 11:20.  
Item 54: Do not agree. LSR received 05/09 14:46; FOC sent 05/10 12:36.  
Item 55: Do not agree. LSR received 05/09 14:36; FOC sent 5/10 12:02.  
Item 56: Do not agree. LSR received date 05/09 14:40; FOC sent 5/10 11:56. 05/10/2001.  
Item 57: Do not agree. LSR received date 05/09 14:28; FOC to customer 05/10 11:00.

### **Summary of FOC Timeliness Results – Non-Mechanized Firm Order Confirmations (FOCs):**

<b># of Transactions</b>	<b>= 157 (36 PONS excluded – SQM O-9 does not apply)</b>
<b># Missed FOCs</b>	<b>= 6</b>
<b># Met FOCs</b>	<b>= <u>151</u></b>
<b>% FOCs Returned</b>	<b>= 96.2%</b>

### **2<sup>nd</sup> Amended Issue:**

In KPMG Consulting's professional opinion orders sent to the CRSG that do not require a service inquiry should be evaluated in a manner similar to O-9 of BellSouth's Service Quality Measurement Plan<sup>3</sup>. During the production test of non-mechanized orders, BellSouth returned 34% of FOCs in greater than a 36 hour time frame.

The following table contains the non-mechanized FOC timeliness results through December 5, 2001 for FOCs received via fax and electronic mail.

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<sup>3</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

## FLORIDA OSS BELL SOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90

ISSUE 1	<36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>=72 hrs	Total
Number of Transactions	84	6	14	23	127
Percent	66%	5%	11%	18%	100%

The following is a list of PONs which did not receive non-mechanized FOCs from BellSouth within 36 hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	035051FPMC010005	00	9990	6/18/01 4:10 PM	6/27/01 3:11 PM
2	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
3	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
4	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
5	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
6	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
9	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
12	042031FPMC000002	01	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
13	042031FPMC000004	01	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
14	042031FPMC000005	01	9990	7/18/01 4:53 PM	7/25/01 12:12 PM
15	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 2:02 PM
16	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
17	051021FPMC001004	01	9990	11/14/01 12:30 PM	11/29/01 3:52 PM
18	051021FPMC000007	01	9990	11/14/01 12:30 PM	11/29/01 4:05 PM
19	051021FPMC010008	01	9990	11/14/01 12:26 PM	11/21/01 9:41 AM

## FLORIDA OSS BELLSOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90

20	051021FPMC000009	01	9990	11/8/01 3:07 PM	11/20/01 5:56 PM
21	051021FPMC010010	01	9990	11/14/01 12:26 PM	11/21/01 9:43 AM
22	051021FPMC000012	01	9990	11/8/01 3:07 PM	11/20/01 5:55 PM
23	051021FPMC000013	01	9990	11/13/01 8:24 PM	11/21/01 10:10 AM
24	051021FPMC010015	01	9990	11/13/01 8:27 PM	11/21/01 9:58 AM
25	051021FPMC000016	01	9990	11/14/01 9:15 PM	11/29/01 4:05 PM
26	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
28	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
29	056012FPMC020004	00	9990	8/3/01 10:23 AM	8/27/01 10:21 AM
30	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
31	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
32	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
33	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
34	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
35	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
36	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
37	058022FPMC000001	01 CR 02	9993	7/17/01 3:41 PM	7/30/01 3:12 PM
38	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
39	058031FPMC000001	00	9993	4/3/01 10:47 AM	4/12/01 5:36 PM
40	058031FPMC000003	00	9993	4/3/01 9:55 AM	4/10/01 5:08 PM
41	058031FPMC000005	00	9993	4/3/01 10:21 AM	4/10/01 5:08 PM
42	058031FPMC000007	01	9993	4/10/01 3:08 PM	4/17/01 4:45 PM
43	060011FPMC000006	00 CR 01	9993	8/6/01 5:15 PM	8/20/01 9:54 AM
44	060011FPMC000008	00 CR 01	9993	8/6/01 5:15 PM	8/20/01 9:56 AM

### Impact:

The receipt of timely FOCs is critical to the CLEC's ability to deliver service to customers in a timely manner. Delays in the return of FOCs could negatively impact the

## **FLORIDA OSS BELL SOUTH'S RESPONSE TO 2<sup>nd</sup> AMENDED EXCEPTION 90**

timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

### **BellSouth's Response:**

As BellSouth described in its 2<sup>nd</sup> response to KPMG's 1<sup>st</sup> amended exception, the SQM O-9 identified in this exception for Non-Mechanized LSRs applies to the LCSC as it specifically states in the Business Rules: "The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON."

The SQM O-10 measure does not apply to the PONs issued to the CRSG in this exception. This SQM Level of Disaggregation is for xDSL (includes UNE unbundled ADSL, HDSL, and UNE Unbundled Copper Loops) and Unbundled Interoffice Transport.

The Products and Services Interval Guide provides the intervals for complex products and services that require service inquiries or provides additional time for technical direction or assistance from the CRSG/Account Team. The appropriate centers that Complex Resale LSRs should be submitted to are listed in the BBR-LO.

BellSouth's analysis of the 57 PONs KPMG identified in this exception indicates that only 4 should be measured under the SQM O-9 measure which applies to the LCSC. The remaining 53 were sent to the CRSG (SQM O-9 does not apply).

BellSouth disagrees with KPMG assessment of the 2<sup>nd</sup> amended issue. BellSouth has been ordered and strives to meet the 2200+ levels of disaggregated measures that have been ordered by the Florida commission. Where these measures do not cover specific products, BellSouth has committed to provide levels of service as described within the Products and Services Interval Guide for FOC timeliness.

BellSouth cannot unilaterally change the SQM measures without the approval of the Florida Commission. KPMG can consider addressing this issue and their opinion in the metrics adequacy review, and apply the current standards as they are described in the approved SQM manual and in the Products and Services Interval Guide for the purpose of this test.

# FLORIDA OSS BELLSOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90



Florida OSS Test  
3<sup>rd</sup> Amended Exception #90

Date: February 15, 2002

## EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV1).

### Exception:

**KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and electronic mail. (TVV1)**

### Background:

The Bell South Products & Service Interval Guide<sup>1</sup> states that BellSouth should return 85% of Non-Mechanized FOCs to Competitive Local Exchange Carriers (CLECs) within a defined interval for each product type.

### Issue:

KPMG Consulting has received Non-Mechanized FOCs after the interval guide standard. The following are the Non-Mechanized FOC timeliness results as of July 16, 2001:

	On Time	Late	Total
Instances	128	31	159
Percentage	80%	20%	--

The following is a list of PONs that received Non-Mechanized FOCs after the interval guide standard

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
029021FPMC000004	VER 01 CR 01	7/13/01 1:28 PM	7/15/01 1:28 PM	7/16/01 9:10 AM	FAX
035051FPMC000003	00	4/2/01 5:14 PM	4/4/01 5:14 PM	4/5/01 9:35 AM	EMAIL
035051FPMC010005	CR 01	6/19/01 4:10 PM	6/21/01 4:10 PM	6/27/01 3:11 PM	EMAIL
035081FPMC010001	REPON 1	4/5/01 4:19 PM	4/10/01 4:19 PM	4/13/01 3:49 PM	EMAIL
035081FPMC010002	REPON 1	5/14/01 5:50 PM	5/17/01 5:50 PM	5/22/01 3:06 PM	EMAIL
035081FPMC000003	VER 01	5/7/01 5:00 PM	5/10/01 5:00 PM	5/21/01 1:38 PM	EMAIL

<sup>1</sup> BellSouth Products & Services Interval Guide – Issue 4a 2001

## FLORIDA OSS BELLSOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90

PON	Ver	LSR Sent	Interval Guide Response Received Date	FOC Received	Delivery Method
035081FPMC000004	00	5/4/01 1:46 PM	5/9/01 1:46 PM	5/22/01 3:08 PM	EMAIL
035081FPMC000006	00	5/4/01 1:48 PM	5/9/01 1:48 PM	5/23/01 9:26 AM	EMAIL
035081FPMC000007	00	5/4/01 1:49 PM	5/9/01 1:49 PM	5/18/01 2:15 PM	EMAIL
036021FPMC010003	VER 01 CR 01	6/28/01 11:26 AM	7/2/01 11:26 AM	7/3/01 12:01 PM	EMAIL
036021FPMC010004	VER 01 CR 01	7/6/01 5:01 PM	7/8/01 5:01 PM	7/9/01 3:46 PM	EMAIL
036121FPMC000002	00	6/13/01 5:22 PM	6/15/01 5:22 PM	6/27/01 10:54 AM	EMAIL
040061FPMC000003	VER 00 CR 01	5/18/01 3:06 PM	5/27/01 3:06 PM	6/8/01 3:06 PM	EMAIL
056012FPMC020001	REPON 2	5/24/01 9:42 AM	5/29/01 9:42 AM	6/1/01 3:17 PM	EMAIL
056012FPMC010003	VER 01 CR	4/12/01 4:27 PM	4/17/01 4:27 PM	4/23/01 2:54 PM	EMAIL
056012FPMC000006	VER 01 CR 01	6/4/01 6:10 PM	6/7/01 6:10 PM	6/8/01 5:51 PM	EMAIL
056012FPMC010007	CR 01	5/8/01 6:10 PM	5/7/01 3:44 PM	5/18/01 3:37 PM	EMAIL
056012FPMC010008	CR 01	5/8/01 5:59 PM	5/11/01 5:59 PM	5/15/01 6:18 PM	EMAIL
056012FPMC000009	CR 02	4/3/01 12:18 PM	4/6/01 12:18 PM	4/13/01 4:24 PM	EMAIL
056012FPMC000010	00	5/24/01 3:40 PM	5/29/01 3:40 PM	6/15/01 2:57 PM	EMAIL
056012FPMC000013	00	5/7/01 12:23 PM	5/10/01 12:23 PM	5/17/01 3:49 PM	EMAIL
056012FPMC000014	00	5/4/01 4:06 PM	5/9/01 4:06 PM	5/11/01 2:53 PM	EMAIL
058022FPMC000002	CR 01	3/15/01 12:09 PM	3/20/01 12:09 PM	4/3/01 1:46 PM	EMAIL
058031FPMC000001	CR 03	4/3/01 10:47 AM	4/6/01 10:47 AM	4/12/01 5:36 PM	EMAIL
058031FPMC000003	CR 02	4/3/01 9:55 AM	4/6/01 9:55 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000005	CR 02	4/3/01 10:21 AM	4/6/01 10:21 AM	4/10/01 5:08 PM	EMAIL
058031FPMC000006	CR 02	4/3/01 10:31 AM	4/6/01 10:31 AM	4/11/01 4:47 PM	EMAIL
058031FPMC000007	VER 01 CR	4/10/01 3:08 PM	4/13/01 3:08 PM	4/17/01 4:45 PM	EMAIL
072131FPMC000027	VER 02 CR	6/22/01 11:42 AM	6/23/01 11:42 AM	6/28/01 9:46 AM	FAX
073051FPMC010027	VER 01 CR 01	6/18/01 5:33 PM	6/19/01 5:33 PM	6/21/01 3:08 PM	FAX
100012FPMC030001	REPON 3	7/12/01 6:05 PM	7/13/01 6:05 PM	7/16/01 8:35 AM	FAX

### Amended Exception:

*KPMG Consulting amended this exception prior to BellSouth response to the PONs listed above.*

### Background:

According to Ordering Measure O-9 of the Service Quality Measurement Plan<sup>2</sup>, BellSouth should return  $\geq 85\%$  of non-mechanized FOCs to CLECs within 36 hours of receiving the Local Service Request (LSR). During the production test, KPMG Consulting received non-mechanized FOCs after the 36-hour interval has elapsed.

### Issue:

The following are the non-mechanized FOC timeliness results from March 13, 2001 through July 31, 2001.

<36 hrs	>=36 and	>=48 and	>=72
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<sup>2</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

## FLORIDA OSS BELL SOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90

ISSUE 1		<48 hrs	<72 hrs	hrs	Total
Number of Transactions	136	9	10	38	193
Percent	70%	5%	5%	20%	100%

Following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within 36 hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	058031FPMC010002	00	9993	6/19/01 4:12 PM	7/30/01 3:12 PM
2	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
3	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
4	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
5	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
6	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	043021FPMC020001	00	9993	7/10/01 5:35 PM	7/24/01 2:48 PM
9	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	058022FPMC000001	01	9993	7/17/01 3:41 PM	7/30/01 3:12 PM
12	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
13	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
14	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
15	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
16	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
17	058031FPMC000001	00	9990	4/3/01 10:47 AM	4/12/01 5:36 PM
18	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 12:02 PM
19	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
20	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
21	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
22	035051FPMC010005	00	9990	6/19/01 4:10 PM	6/27/01 3:11 PM
23	058031FPMC000003	00	9990	4/3/01 9:55 AM	4/10/01 5:08 PM
24	058031FPMC000005	00	9990	4/3/01 10:21 AM	4/10/01 5:08 PM
25	058031FPMC000007	01	9990	4/10/01 3:08 PM	4/17/01 4:45 PM
26	042031FPMC000002	00	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
27	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
28	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
29	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
30	042031FPMC000004	00	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
31	042031FPMC000005	00	9990	7/18/01 4:53 PM	7/25/01 12:12 PM
32	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
33	035081FPMC010002	00	9990	5/17/01 11:40 AM	5/22/01 3:06 PM
34	036021FPMC010003	01	9990	6/28/01 11:26 AM	7/3/01 12:01 PM
35	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
36	060011FPMC000002	04	9993	7/26/01 4:30 PM	7/30/01 3:16 PM
37	043021FPMC002001	01	9993	7/20/01 4:52 PM	7/24/01 2:45 PM
38	100012FPMC030001	00	9990	7/12/01 6:05 PM	7/16/01 8:35 AM



## FLORIDA OSS BELL SOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90

Item	PON	Ver	CC	LSR Sent	FOC Received
39	035051FPMC000003	00	9990	4/2/01 5:14 PM	4/5/01 9:35 AM
40	029021FPMC020003	04	9993	7/18/01 3:11 PM	7/20/01 8:10 PM
41	029021FPMC000005	02	9993	7/18/01 3:32 PM	7/20/01 8:14 PM
42	058031FPMC000011	01	9993	4/10/01 3:11 PM	4/12/01 6:17 PM
43	058031FPMC000010	01	9993	4/10/01 3:10 PM	4/12/01 6:13 PM
44	058031FPMC000009	01	9993	4/10/01 3:09 PM	4/12/01 6:10 PM
45	058031FPMC000008	01	9993	4/10/01 3:09 PM	4/12/01 6:05 PM
46	056012FPMC000011	01	9990	6/13/01 12:04 PM	6/15/01 2:58 PM
47	035051FPMC000004	00	9990	4/3/01 11:46 AM	4/5/01 2:16 PM
48	042031FPMC030001	03	9990	7/3/01 4:00 PM	7/5/01 6:01 PM
49	058031FPMC000004	00	9993	4/9/01 5:27 PM	4/11/01 4:47 PM
50	058031FPMC000006	00	9993	4/9/01 6:21 PM	4/11/01 4:47 PM
51	035051FPMC000002	00	9990	4/3/01 11:22 AM	4/5/01 9:46 AM
52	072131FPMC000027	02	9993	6/26/01 1:13 PM	6/28/01 9:46 AM
53	028011FPMC000004	01	9993	6/20/01 3:49 PM	6/22/01 11:25 AM
54	025011FPMC010006	00	9990	5/8/01 5:31 PM	5/10/01 12:40 PM
55	025011FPMC010004	00	9990	5/8/01 5:29 PM	5/10/01 12:05 PM
56	025011FPMC010005	00	9990	5/8/01 5:30 PM	5/10/01 12:00 PM
57	025011FPMC010002	00	9990	5/8/01 5:27 PM	5/10/01 11:05 AM

### BellSouth's Response:

BellSouth's findings are listed below by item number. All times listed are Central times.

Complex services ordered with a service inquiry are measured under 0-10 Service Inquiry with LSR Firm Order Confirmation Response Time Manual. It measures the interval and the percent within the interval from the submission of a Service Inquiry (SI) with Firm Order LSR to the distribution of a Firm Order Confirmation (FOC). It appears that KPMG failed to use the applicable SQM measure for services requiring a service inquiry processed in the CRSG. The O-9 SQM measure does not apply to non-mechanized complex services requiring service inquiries.

According to Ordering Measure O-9 Firm Order Confirmation Timeliness for the Service Quality Measurement Plan of BellSouth's OSS Testing Florida Interim Performance Metrics Version 3.0, it appears that KPMG failed to consider applicable exclusions in their calculation for the 36-hour interval for non-mechanized FOCs.

- Item 1: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 2: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 3: Agree with KPMG. UNE Combo BRI.
- Item 4: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 5: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 6: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.

## **FLORIDA OSS BELL SOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90**

- Item 7: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 8: Agree with KPMG. Resale BRI.
- Item 9: Agree with KPMG. Resale BRI.
- Item 10: Agree with KPMG. UNE Combo BRI.
- Item 11: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 12: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 does not apply for this service.
- Item 13: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 14: Do not agree. 56K Synchronet. Service Inquiry required. O-9 does not apply.
- Item 15: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 16: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 17: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 18: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 19: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 20: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 21: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 22: Agree with KPMG. UNE Combo BRI.
- Item 23: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 24: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 25: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 26: Do not agree. Resale PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 27: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 28: Agree with KPMG. UNE Combo BRI.
- Item 29: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 30: Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.
- Item 31: Do not agree. New Resale PRI order. Service Inquiry required. O-9 SQM does not apply.

## FLORIDA OSS BELL SOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90

- Item 32: Agree with KPMG. UNE Combo BRI.
- Item 33: Do not agree. UNE Combo PRI. Service Inquiry required. O-9 SQM does not apply.
- Item 34: Do not agree. UNE Combo BRI. CRSG has no record of receipt on 06/28. LSR received 07/02 07:11. FOC sent 07/03 12:01.
- Item 35: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 36: Do not agree. DID order. Service Inquiry required. O-9 SQM does not apply.
- Item 37: Agree with KPMG. Resale BRI.
- Item 38: Do not agree. LSR received 07/13 08:48. FOC sent 07/16 08:33.
- Item 39: Do not agree with KPMG. UNE Combo BRI. LSR received 04/03 16:13. FOC sent 04/05 08:35.
- Item 40: Do not agree. LSR received 07/18 15:06. FOC sent 07:19 10:55.
- Item 41: Do not agree. LSR received 07/18 15:28. FOC sent 07/19 11:57.
- Item 42: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 43: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 44: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 45: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 46: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 47: Do not agree. UNE Combo BRI. LSR received 04/03 10:45. FOC sent 04/05 01:16.
- Item 48: Do not agree. Resale PRI. Service Inquiry required. O-9 does not apply.
- Item 49: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 50: Do not agree. 56K Synchronet. Service Inquiry required. O-9 SQM does not apply.
- Item 51: Do not agree. UNE Combo BRI. LSR received 04/03 13:06. FOC sent 04/05 07:52.
- Item 52: Do not agree. UNE Combo BRI. LSR received 06/26 12:13.
- Item 53: Do not agree. LSR received 06/20 15:46; FOC sent 06/22 11:20.
- Item 54: Do not agree. LSR received 05/09 14:46; FOC sent 05/10 12:36.
- Item 55: Do not agree. LSR received 05/09 14:36; FOC sent 5/10 12:02.
- Item 56: Do not agree. LSR received date 05/09 14:40; FOC sent 5/10 11:56. 05/10/2001.
- Item 57: Do not agree. LSR received date 05/09 14:28; FOC to customer 05/10 11:00.

## **FLORIDA OSS BELLSOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90**

### **Summary of FOC Timeliness Results – Non-Mechanized Firm Order Confirmations (FOCs):**

<b># of Transactions</b>	<b>= 157</b> (36 PONS excluded – SQM O-9 does not apply)
<b># Missed FOCs</b>	<b>= 6</b>
<b># Met FOCs</b>	<b>= <u>151</u></b>
<b>% FOCs Returned</b>	<b>= 96.2%</b>

#### **2<sup>nd</sup> Amended Issue:**

In KPMG Consulting's professional opinion orders sent to the CRSG that do not require a service inquiry should be evaluated in a manner similar to O-9 of BellSouth's Service Quality Measurement Plan<sup>3</sup>. During the production test of non-mechanized orders, BellSouth returned 34% of FOCs in greater than a 36 hour time frame. The following table contains the non-mechanized FOC timeliness results through December 5, 2001 for FOCs received via fax and electronic mail.

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<sup>3</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

## FLORIDA OSS BELLSOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90

ISSUE 2	<36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>=72 hrs	Total
Number of Transactions	84	6	14	23	127
Percent	66%	5%	11%	18%	100%

The following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within 36 hours.

Item	PON	Ver	CC	LSR Sent	FOC Received
1	035051FPMC010005	00	9990	6/18/01 4:10 PM	6/27/01 3:11 PM
2	035081FPMC010001	00	9990	4/5/01 4:19 PM	4/13/01 3:49 PM
3	035081FPMC000003	01	9990	5/7/01 5:00 PM	5/21/01 1:38 PM
4	035081FPMC000004	00	9990	5/4/01 1:46 PM	5/22/01 3:08 PM
5	035081FPMC020005	00	9990	6/14/01 10:40 AM	6/26/01 4:06 PM
6	035081FPMC000006	00	9990	5/4/01 1:48 PM	5/23/01 9:26 AM
7	035081FPMC000007	00	9990	5/4/01 1:49 PM	5/18/01 2:15 PM
8	036021FPMC010001	01	9990	5/17/01 4:13 PM	5/24/01 4:20 PM
9	036021FPMC000002	00	9990	6/1/01 10:53 AM	6/6/01 5:46 PM
10	036121FPMC000002	00	9990	6/13/01 5:22 PM	6/27/01 10:54 AM
11	040061FPMC000003	00	9993	5/18/01 3:06 PM	6/8/01 3:06 PM
12	042031FPMC000002	01	9990	7/18/01 4:48 PM	7/25/01 6:23 PM
13	042031FPMC000004	01	9990	7/18/01 4:51 PM	7/25/01 12:13 PM
14	042031FPMC000005	01	9990	7/18/01 4:53 PM	7/25/01 12:12 PM
15	042031FPMC000006	00	9990	7/18/01 4:54 PM	7/27/01 2:02 PM
16	042031FPMC000007	00	9990	7/18/01 4:55 PM	7/27/01 9:56 AM
17	051021FPMC001004	01	9990	11/14/01 12:30 PM	11/29/01 3:52 PM
18	051021FPMC000007	01	9990	11/14/01 12:30 PM	11/29/01 4:05 PM
19	051021FPMC010008	01	9990	11/14/01 12:26 PM	11/21/01 9:41 AM
20	051021FPMC000009	01	9990	11/8/01 3:07 PM	11/20/01 5:56 PM
21	051021FPMC010010	01	9990	11/14/01 12:26 PM	11/21/01 9:43 AM
22	051021FPMC000012	01	9990	11/8/01 3:07 PM	11/20/01 5:55 PM
23	051021FPMC000013	01	9990	11/13/01 8:24 PM	11/21/01 10:10 AM
24	051021FPMC010015	01	9990	11/13/01 8:27 PM	11/21/01 9:58 AM
25	051021FPMC000016	01	9990	11/14/01 9:15 PM	11/29/01 4:05 PM
26	056012FPMC020001	00	9990	5/24/01 9:42 AM	6/1/01 3:17 PM
28	056012FPMC010003	01	9990	4/12/01 4:27 PM	4/23/01 2:54 PM
29	056012FPMC020004	00	9990	8/3/01 10:23 AM	8/27/01 10:21 AM
30	056012FPMC000006	01	9990	6/4/01 6:10 PM	6/8/01 5:51 PM
31	056012FPMC010007	00	9990	5/8/01 6:10 PM	5/18/01 3:37 PM
32	056012FPMC010008	00	9990	5/8/01 5:59 PM	5/15/01 6:18 PM
33	056012FPMC000009	00	9990	4/3/01 12:18 PM	4/13/01 4:24 PM
34	056012FPMC000010	00	9990	5/24/01 3:40 PM	6/15/01 2:57 PM
35	056012FPMC000013	00	9990	5/7/01 12:23 PM	5/17/01 3:49 PM
36	056012FPMC000014	00	9990	5/4/01 4:06 PM	5/11/01 2:53 PM
37	058022FPMC000001	01 CR 02	9993	7/17/01 3:41 PM	7/30/01 3:12 PM

## FLORIDA OSS BELLSOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90

Item	PON	Ver	CC	LSR Sent	FOC Received
38	058022FPMC000002	00	9993	3/15/01 12:09 PM	4/3/01 1:46 PM
39	058031FPMC000001	00	9993	4/3/01 10:47 AM	4/12/01 5:36 PM
40	058031FPMC000003	00	9993	4/3/01 9:55 AM	4/10/01 5:08 PM
41	058031FPMC000005	00	9993	4/3/01 10:21 AM	4/10/01 5:08 PM
42	058031FPMC000007	01	9993	4/10/01 3:08 PM	4/17/01 4:45 PM
43	060011FPMC000006	00 CR 01	9993	8/6/01 5:15 PM	8/20/01 9:54 AM
44	060011FPMC000008	00 CR 01	9993	8/6/01 5:15 PM	8/20/01 9:56 AM

### **Impact:**

The receipt of timely FOCs is critical to the CLEC's ability to deliver service to customers in a timely manner. Delays in the return of FOCs could negatively impact the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

### **BellSouth's Response:**

As BellSouth described in its 2<sup>nd</sup> response to KPMG's 1<sup>st</sup> amended exception, the SQM O-9 identified in this exception for Non-Mechanized LSRs applies to the LCSC as it specifically states in the Business Rules: "The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON."

The SQM O-10 measure does not apply to the PONs issued to the CRSG in this exception. This SQM Level of Disaggregation is for xDSL (includes UNE unbundled ADSL, HDSL, and UNE Unbundled Copper Loops) and Unbundled Interoffice Transport.

The Products and Services Interval Guide provides the intervals for complex products and services that require service inquiries or provides additional time for technical direction or assistance from the CRSG/Account Team. The appropriate centers that Complex Resale LSRs should be submitted to are listed in the BBR-LO.

BellSouth's analysis of the 57 PONs KPMG identified in this exception indicates that only 4 should be measured under the SQM O-9 measure which applies to the LCSC. The remaining 53 were sent to the CRSG (SQM O-9 does not apply).

BellSouth disagrees with KPMG assessment of the 2<sup>nd</sup> amended issue. BellSouth has been ordered and strives to meet the 2200+ levels of disaggregated measures that have been ordered by the Florida commission. Where these measures do not cover specific products, BellSouth has committed to provide levels of service as described within the Products and Services Interval Guide for FOC timeliness.

BellSouth cannot unilaterally change the SQM measures without the approval of the Florida Commission. KPMG can consider addressing this issue and their opinion in the metrics adequacy review, and apply the current standards as they are described in the approved SQM manual and in the Products and Services Interval Guide for the purpose of this test.

### **3<sup>rd</sup> Amended Issue:**

## **FLORIDA OSS BELLSOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90**

Upon review of BellSouth's Service Quality Measurement Plan<sup>4</sup> and the BellSouth Products and Services Interval Guide<sup>5</sup>, KPMG Consulting determined that BellSouth is returning FOCs in greater than the allotted time specified in the documents referenced above.

Orders e-mailed to the CRSG that require a BellSouth internal Service Inquiry form, were evaluated by KPMG Consulting under the measures specified in 0-10<sup>6</sup> of the SQM. For orders e-mailed to the CRSG that did not require a BellSouth internal Service Inquiry form, and were therefore not measured under 0-10, KPMG Consulting, referred to the Targeted LSR Processing Interval, outlined in the Products and Services Interval Guide. Orders sent via fax to the to the Local Carrier Service Center (LCSC) are measured under 0-9 of the SQM.

During the production test of non-mechanized orders, BellSouth returned 26% of FOCs in greater than the stated FOC interval time frame. The following table contains the non-mechanized FOC timeliness results through December 5, 2001 for FOCs received via fax and electronic mail.

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<sup>4</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

<sup>5</sup> BellSouth Products and Services Interval Guide-5A January 2002

<sup>6</sup> KPMG Consulting reviewed the 0-10 measure for the purposes of this exception only and will not be evaluating BellSouth on measure 0-10 in the BellSouth OSS Evaluation Final Report.

## FLORIDA OSS BELL SOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90

ISSUE 3	<36 hrs	>=36 and <48 hrs	>=48 and <72 hrs	>=72 hrs	Total
Number of Transactions	94	5	8	20	127
Percent	74%	4%	6%	16%	100%

The following is a list of PONs, which did not receive non-mechanized FOCs from BellSouth within 36 hours.

#	Product	REQ TYP ACT	BLS SI	PON	VER	CC	LSR Sent	FOC Received
1	56K Synchronet	E/N	Y	056012FPMC020004	0	9990	8/3/2001 10:23	8/27/2001 10:21
2	56K Synchronet	E/N	Y	056012FPMC000010	0	9990	5/24/2001 15:40	6/15/2001 14:57
3	UNE Combo BRI	M/C	Y	040061FPMC000003	0	9993	5/18/2001 15:06	6/8/2001 15:06
4	56K Synchronet	E/C	Y	058022FPMC000002	0	9993	3/15/2001 12:09	4/3/2001 13:46
5	UNE Combo PRI	M/V	N	035081FPMC000006	0	9990	5/4/2001 13:48	5/23/2001 9:26
6	UNE Combo PRI	M/V	N	035081FPMC000004	0	9990	5/4/2001 13:46	5/22/2001 15:08
7	UNE Combo DS1	M/V	N	051021FPMC000007	1	9990	11/14/2001 12:30	11/29/2001 16:05
8	UNE Combo DS1	M/V	N	051021FPMC001004	1	9990	11/14/2001 12:30	11/29/2001 15:52
9	UNE Combo DS1	M/V	N	051021FPMC000016	1	9990	11/14/2001 21:15	11/29/2001 16:05
10	UNE Combo PRI	M/V	N	035081FPMC000007	0	9990	5/4/2001 13:49	5/18/2001 14:15
11	UNE Combo PRI	M/V	N	035081FPMC000003	1	9990	5/7/2001 17:00	5/21/2001 13:38
12	UNE Combo BRI	M/V	N	036121FPMC000002	0	9990	6/13/2001 17:22	6/27/2001 10:54
13	Resale DS1	N/C	N	060011FPMC000008	0	9993	8/6/2001 17:15	8/20/2001 9:56
14	Resale DS1	N/C	N	060011FPMC000006	0	9993	8/6/2001 17:15	8/20/2001 9:54
15	56K Synchronet	E/C	Y	058022FPMC000001	1	9993	7/17/2001 15:41	7/30/2001 15:12
16	UNE Combo PRI	M/V	N	035081FPMC020005	0	9990	6/14/2001 10:40	6/26/2001 16:06
17	56K Synchronet	E/N	Y	056012FPMC000009	0	9990	4/3/2001 12:18	4/13/2001 16:24
18	56K Synchronet	E/N	Y	056012FPMC000013	0	9990	5/7/2001 12:23	5/17/2001 15:49
19	UNE Combo DS1	M/V	N	051021FPMC000009	1	9990	11/8/2001 15:07	11/20/2001 17:56
20	UNE Combo DS1	M/V	N	051021FPMC000012	1	9990	11/8/2001 15:07	11/20/2001 17:55
21	UNE Combo BRI	M/V	N	035051FPMC010005	0	9990	6/18/2001 16:10	6/27/2001 15:11
22	Resale PRI	E/N	Y	042031FPMC000006	0	9990	7/18/2001 16:54	7/27/2001 14:02
23	Resale PRI	E/N	Y	042031FPMC000007	0	9990	7/18/2001 16:55	7/27/2001 9:56
24	UNE Combo PRI	M/V	N	035081FPMC010001	0	9990	4/5/2001 16:19	4/13/2001 15:49
25	UNE Combo DS1	M/V	N	051021FPMC000013	1	9990	11/13/2001 20:24	11/21/2001 10:10
26	UNE Combo DS1	M/V	N	051021FPMC010015	1	9990	11/13/2001 20:27	11/21/2001 9:58
27	Resale PRI	E/N	Y	042031FPMC000002	1	9990	7/18/2001 16:48	7/25/2001 18:23
28	UNE Combo BRI	M/V	N	036021FPMC010001	1	9990	5/17/2001 16:13	5/24/2001 16:20
29	UNE Combo DS1	M/V	N	051021FPMC010010	1	9990	11/14/2001 12:26	11/21/2001 9:43
30	UNE Combo DS1	M/V	N	051021FPMC010008	1	9990	11/14/2001 12:26	11/21/2001 9:41
31	Resale PRI	E/N	Y	042031FPMC000004	1	9990	7/18/2001 16:51	7/25/2001 12:13
32	Resale PRI	E/N	Y	042031FPMC000005	1	9990	7/18/2001 16:53	7/25/2001 12:12
33	UNE Combo BRI	M/V	N	036021FPMC000002	0	9990	6/1/2001 10:53	6/6/2001 17:46



## FLORIDA OSS BELLSOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90

### Impact:

The receipt of timely FOCs is critical to a CLECs ability to deliver service to customers in a timely manner. Delays in the return of FOCs could negatively impact the timeliness of the completion of CLEC orders, decreasing overall CLEC customer satisfaction.

### BellSouth's 3<sup>rd</sup> Amended Response:

BellSouth agrees with KPMG's evaluation of 30 of the 127 PONs. However, as stated in the 2<sup>nd</sup> response to KPMG's 1<sup>st</sup> amended exception, the SQM O-10 measure does not apply to the PONs issued to the CRSG in this exception. This SQM Level of Disaggregation is for xDSL (includes UNE unbundled ADSL, HDSL, and UNE Unbundled Copper Loops) and Unbundled Interoffice Transport.

The Products and Services Interval Guide provides the intervals for complex products and services that require service inquiries or provides additional time for technical direction or assistance from the CRSG/Account Team. The appropriate centers that Complex Resale LSRs should be submitted to are listed in the BBR-LO.

BellSouth's findings for each PON are listed below by item number:

- Item 1: Agree with KPMG. 56K Synchronet. Employee error.
- Item 2: Agree with KPMG. 56K Synchronet. Employee error.
- Item 3: Do not agree. UNE Combo BRI. CRSG SD advised CLEC paperwork received was duplicate of an existing PON. Correct paperwork sent to SD on 06/04/2001. FOC to CLEC 06/08/2001. Met interval based on 06/04/2001 submission of correct paperwork.
- Item 4: Agree with KPMG. 56K Synchronet request. Employee error.
- Item 5: Agree with KPMG. UNE Combo PRI. Employee error.
- Item 6: Agree with KPMG. UNE Combo PRI. Employee error.
- Item 7: Do not agree. No record of PON in CRSG.
- Item 8: Do not agree. No record of PON in CRSG.
- Item 9: Agree with KPMG. UNE Combo DS1. Employee error.
- Item 10: Agree with KPMG. UNE Combo PRI. Employee error.
- Item 11: Agree with KPMG. UNE Combo PRI. Employee error.
- Item 12: Agree with KPMG. UNE Combo BRI. Employee error.
- Item 13: Agree with KPMG. Resale DS1. Missed interval.
- Item 14: Agree with KPMG. Resale DS1. Missed interval.
- Item 15: Agree with KPMG. 56K Synchronet. Employee error.
- Item 16: Agree with KPMG. UNE Combo PRI. Employee error.
- Item 17: Agree with KPMG. 56K Synchronet. Missed interval.
- Item 18: Agree with KPMG. 56K Synchronet. Missed interval.
- Item 19: Agree with KPMG. UNE Combo DS1. Employee error.
- Item 20: Agree with KPMG. UNE Combo DS1. Employee error.
- Item 21: Agree with KPMG. UNE Combo BRI. Employee error.
- Item 22: Agree with KPMG. Resale PRI. Employee error.
- Item 23: Agree with KPMG. Resale PRI. Employee error.

## **FLORIDA OSS BELLSOUTH'S RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 90**

Item 24:	Agree with KPMG. UNE Combo PRI. Employee error.
Item 25:	Agree with KPMG. UNE Combo DS1. Employee error.
Item 26:	Agree with KPMG. UNE Combo DS1. Employee error.
Item 27:	Agree with KPMG. Resale PRI. Employee error.
Item 28:	Agree with KPMG. UNE Combo BRI. Employee error.
Item 29:	Agree with KPMG. UNE Combo DS1. Employee error.
Item 30:	Agree with KPMG. UNE Combo DS1. Employee error.
Item 31:	Agree with KPMG. Resale PRI. Employee error.
Item 32:	Agree with KPMG. Resale PRI. Employee error.
Item 33:	Agree with KPMG. UNE Combo PRI. Internal CRSB delay. Missed interval.

Summary of FOC Timeliness Results – Non-Mechanized Firm Order Confirmations:

Agree with KPMG findings	30
Disagree with KPMG findings	3

The receipt of timely Non-mechanized FOCs is as follows:

Number of Transactions	127
Number of Transactions-No Record	2
Number of Transactions Missed FOCs	30
Base Number	125
Number of Transactions Met FOCs	<u>95</u>
% FOC Returned	76%

BellSouth will cover personnel on FOC Timeliness to prevent future recurrence of the issues identified in the items referenced above by February 28, 2002.

## DISPOSITION REPORT FOR EXCEPTION 90

BellSouth Florida OSS Testing Evaluation

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Date: May 29, 2002

### EXCEPTION DISPOSITION REPORT

#### Exception:

**KPMG Consulting did not receive timely Non-Mechanized Firm Order Confirmations (FOCs) from BellSouth via fax and electronic mail. (TVV1)**

#### Summary of Exception:

The BellSouth Products & Service Interval Guide<sup>1</sup> states that BellSouth should return at least 85% of Non-Mechanized FOCs to Competitive Local Exchange Carriers (CLECs) within a defined interval for each product type. As of July 16, 2001, KPMG Consulting's review of test results for Non-Mechanized FOC timeliness revealed that BellSouth returned 128 of 159 FOCs, or 80%, within the defined intervals.

#### Summary of Amended Exception:

According to Ordering Measure O-9 of the Service Quality Measurement Plan<sup>2</sup>, BellSouth should return at least 85% of non-mechanized FOCs to CLECs within 36 hours of receiving the Local Service Request (LSR). During the production test, KPMG Consulting received non-mechanized FOCs after the thirty-six hour interval had elapsed. From March 13, 2001 through July 31, 2001 KPMG Consulting's test results for Non-Mechanized FOC timeliness demonstrated that BellSouth returned 136 of 193 FOCs, or 70%, within the specified interval.

#### Summary of BellSouth's Response:

Thirty six of the 57 PONs listed in Exception 90 required a service inquiry and, therefore, should not have been included in KPMG Consulting's calculation of non-mechanized FOC timeliness within the 36 hour interval. Complex services ordered with a service inquiry are measured under the O-10 Service Inquiry with LSR Firm Order Confirmation Response Time Manual. It measures the interval and the percent within the interval from the submission of a Service Inquiry (SI) with Firm Order LSR to the distribution of a FOC. It appears that KPMG failed to use the applicable SQM measure for services requiring a service inquiry processed in the CRSG. The O-9 SQM measure does not apply to non-mechanized complex services requiring service inquiries.

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<sup>1</sup> BellSouth Products & Services Interval Guide – Issue 4a 2001

<sup>2</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001  
KPMG Consulting, Inc.

5/29/2002

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## DISPOSITION REPORT FOR EXCEPTION 90

BellSouth Florida OSS Testing Evaluation

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### Summary of BellSouth's Amended Response:

The SQM O-10 measure does not apply to the PONs issued to the CRSG in this exception. This SQM Level of Disaggregation is for xDSL (includes UNE unbundled ADSL, HDSL, and UNE Unbundled Copper Loops) and Unbundled Interoffice Transport.

The Products and Services Interval Guide provides the intervals for complex products and services that require service inquiries or provides additional time for technical direction or assistance from the CRSG/Account Team. The appropriate centers that Complex Resale LSRs should be submitted to are listed in the BBR-LO.

BellSouth's analysis of the 57 PONs KPMG identified in this exception indicates that only four should be measured under the SQM O-9 measure which applies to the LCSC. The remaining 53 were sent to the CRSG (SQM O-9 does not apply).

### Summary of 2<sup>nd</sup> Amended Exception:

It is KPMG Consulting's professional opinion that orders sent to the CRSG and not requiring a service inquiry, should be evaluated in a manner similar to O-9 of BellSouth's Service Quality Measurement Plan. During the production test of Non-Mechanized orders, BellSouth returned 34% of FOCs after the 36 hour time frame had elapsed.

### Summary of BellSouth's Response to 2<sup>nd</sup> Amended Exception:

BellSouth disagrees with KPMG Consulting's assessment of the second amended issue. BellSouth has been ordered and strives to meet the 2200+ levels of disaggregated measures that have been ordered by the Florida Public Service Commission. Where these measures do not cover specific products, BellSouth has committed to provide levels of service as described within the Products and Services Interval Guide for FOC timeliness.

BellSouth cannot unilaterally change the SQM measures without the approval of the Florida Public Service Commission. KPMG Consulting can consider addressing this issue and their opinion in the metrics adequacy review, and apply the current standards as they are described in the approved SQM manual and in the Products and Services Interval Guide for the purpose of this test.

### Summary of 3<sup>rd</sup> Amended Exception:

Upon review of BellSouth's Service Quality Measurement Plan and the BellSouth Products and Services Interval Guide, KPMG Consulting determined that BellSouth is returning FOCs in greater than the allotted time specified in the documents referenced above.

## **DISPOSITION REPORT FOR EXCEPTION 90**

### **BellSouth Florida OSS Testing Evaluation**

Orders e-mailed to the CRSG that require a BellSouth internal Service Inquiry form were evaluated by KPMG Consulting under the measures specified in O-10 of the SQM. For orders emailed to the CRSG and not requiring a BellSouth internal Service Inquiry form, and as such, not measured under O-10, KPMG Consulting referred to the Targeted LSR Processing Interval outlined in the Products and Services Interval Guide.

Orders sent via fax to the to the LCSC are measured under O-9 of the SQM.

During the production test of non-mechanized orders (through December 5, 2001), BellSouth returned 26% (33 of 127) of FOCs after the stated FOC interval time frame had elapsed.

#### **Summary of BellSouth's Response to 3<sup>rd</sup> Amended Exception:**

BellSouth agrees with KPMG Consulting's evaluation of 30 of the 33 PONs. However, as stated in the 2nd response to KPMG Consulting's 1<sup>st</sup> amended exception, the SQM O-10 measure does not apply to the PONs issued to the CRSG in this exception. This SQM Level of Disaggregation is for xDSL (includes UNE unbundled ADSL, HDSL, and UNE Unbundled Copper Loops) and Unbundled Interoffice Transport.

The Products and Services Interval Guide provides the intervals for complex products and services that require service inquiries or provides additional time for technical direction or assistance from the CRSG/Account Team. The appropriate centers that Complex Resale LSRs should be submitted to are listed in the BBR-LO.

BellSouth will cover personnel on FOC Timeliness to prevent future recurrence of the issues identified in the 3<sup>rd</sup> amended exception by February 28, 2002.

#### **Summary of KPMG Consulting Re-test Activities:**

KPMG Consulting has conducted an analysis of new data obtained from the second re-test. During the period of February 28, 2002 through May 14, 2002, KPMG Consulting received re-test results on non-mechanized FOC timeliness service requests submitted via email/fax demonstrating that BellSouth had returned 69 of 74 FOCs, or 93%, within the specified interval.

#### **KPMG Consulting Results:**

KPMG Consulting's evaluation of the new data received during the second re-test indicates that BellSouth is now meeting the Service Quality Measurement Plan criteria of returning at least 85% of Non-Mechanized FOCs within twenty-four hours of the LSR.

**Based on the results of re-test activities, KPMG Consulting, with the concurrence of the Florida Public Service Commission, closes Exception 90.**

KPMG Consulting, Inc.

5/29/2002

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## D-2: Percent Database Update Accuracy

### Definition

This report measures the accuracy of database updates by BellSouth for Line Information Database (LIDB), Directory Assistance, and Directory Listings using a statistically valid sample of LSRs/Orders in a manual review. This manual review is not conducted on BellSouth Retail Orders.

### Exclusions

- Updates canceled by the CLEC
- Initial update when supplemented by CLEC
- CLEC orders that had CLEC errors
- BellSouth updates associated with internal or administrative use of local services

### Business Rules

For each update completed during the reporting period, the original update that the CLEC sent to BellSouth is compared to the database following completion of the update by BellSouth. An update is "completed without error" if the database completely and accurately reflects the activity specified on the original and supplemental update (order) submitted by the CLEC. Each database (LIDB, Directory Assistance, and Directory Listings) should be separately tracked and reported.

A statistically valid sample of CLEC Orders are pulled each month. That sample will be used to test the accuracy of the database update process. This is a manual process.

### Calculation

**Percent Update Accuracy** =  $(a / b) \times 100$

- a = Number of Updates Completed Without Error
- b = Number Updates Completed

### Report Structure

- CLEC Aggregate
- CLEC Specific (not available in this report)
- BellSouth Aggregate (not available in this report)

### Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"><li>• Report Month</li><li>• CLEC Order Number (so_nbr) and PON (PON)</li><li>• Local Service Request (LSR)</li><li>• Order Submission Date</li><li>• Number of Orders Reviewed</li></ul> <p><b>Note:</b> Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"><li>• Not Applicable</li></ul>

### SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Database Type <ul style="list-style-type: none"><li>• LIDB</li><li>• Directory Assistance</li><li>• Directory Listings</li></ul>	<ul style="list-style-type: none"><li>• 95% Accurate</li></ul>

**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

## Section 3: Provisioning

### P-1: Mean Held Order Interval & Distribution Intervals

#### Definition

When delays occur in completing CLEC orders, the average period that CLEC orders are held for BellSouth reasons, pending a delayed completion, should be no worse for the CLEC when compared to BellSouth delayed orders. Calculation of the interval is the total days orders are held and pending but not completed that have passed the currently committed due date; divided by the total number of held orders. This report is based on orders still pending, held and past their committed due date at the close of the reporting period. The distribution interval is based on the number of orders held and pending but not completed over 15 and 90 days. (Orders reported in the >90 day interval are also included in the >15 day interval.)

#### Exclusions

- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.)
- Disconnect (D) & From (F) orders
- Orders with appointment code of 'A' for Rural orders

#### Business Rules

**Mean Held Order Interval:** This metric is computed at the close of each report period. The held order interval is established by first identifying all orders, at the close of the reporting interval, that both have not been reported as completed in SOCS and have passed the currently committed due date for the order. For each such order, the number of calendar days between the earliest committed due date on which BellSouth had a company missed appointment and the close of the reporting period is established and represents the held order interval for that particular order. The held order interval is accumulated by the standard groupings, unless otherwise noted, and the reason for the order being held. The total number of days accumulated in a category is then divided by the number of held orders within the same category to produce the mean held order interval. The interval is by calendar days with no exclusions for Holidays or Sundays.

CLEC Specific reporting is by type of held order (facilities, equipment, other), total number of orders held, and the total and average days.

**Held Order Distribution Interval:** This measure provides data to report total days held and identifies these in categories of >15 days and > 90 days. (Orders counted in >90 days are also included in > 15 days).

#### Calculation

**Mean Held Order Interval** =  $a / b$

- $a$  = Sum of held-over-days for all Past Due Orders Held for the reporting period
- $b$  = Number of Past Due Orders Held and Pending But Not Completed and past the committed due date

**Held Order Distribution Interval** (for each interval) =  $(c / d) \times 100$

- $c$  = # of Orders Held for  $\geq 15$  days or # of Orders Held for  $\geq 90$  days
- $d$  = Total # of Past Due Orders Held and Pending But Not Completed)

#### Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Circuit Breakout < 10,  $\geq 10$  (except trunks)



### Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> <li>• Report Month</li> <li>• CLEC Order Number and PON (PON)</li> <li>• Order Submission Date (TICKET_ID)</li> <li>• Committed Due Date (DD)</li> <li>• Service Type (CLASS_SVC_DESC)</li> <li>• Hold Reason</li> <li>• Total Line/circuit Count</li> <li>• Geographic Scope</li> </ul> <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> <li>• Report Month</li> <li>• BellSouth Order Number</li> <li>• Order Submission Date</li> <li>• Committed Due Date</li> <li>• Service Type</li> <li>• Hold Reason</li> <li>• Total Line/circuit Count</li> <li>• Geographic Scope</li> </ul>

### SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• INP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop Non-Design	• Retail Residence and Business - POTS Excluding Switch-Based Orders
• 2W Analog Loop With LNP Design	• Retail Residence and Business Dispatch
• 2W Analog Loop With LNP Non-Design	• Retail Residence and Business - POTS Excluding Switch-Based Orders
• 2W Analog Loop With INP-Design	• Retail Residence and Business Dispatch
• 2W Analog Loop With INP Non-Design	• Retail Residence and Business - POTS Excluding Switch-Based Orders
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop >= DS1	• Retail Digital Loop >= DS1
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Switch Ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL Provided to Retail
• UNE ISDN	• Retail ISDN - BRI
• UNE Line Sharing	• ADSL Provided to Retail
• UNE Other Design	• Retail Design
• UNE Other Non-Design	• Retail Residence and Business
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

P-1: Mean Held Order Interval &amp; Distribution Intervals

**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

**REQUEST:** Describe why BellSouth populates the equity column in its (Monthly State Summary (MSS) performance reports with “Yes” for the Mean Held Orders Interval Measure even though there are no CLEC held orders.

**RESPONSE:** BellSouth populates the equity column in its Monthly State Summary (MSS) performance reports with “Yes” for the Mean Held Orders Interval Measure because BellSouth had no held orders for the report period. Therefore, BellSouth achieved the performance standard for the measurement and populated a “Yes” in the equity column in the MSS report.

**REQUEST:** Describe any differences in the completed orders used in the calculation of the missed appointments measure and the completed orders used in the denominator of the Average Completion Notice Interval Measure.

**RESPONSE:** The Percent Missed Appointment utilizes the completion interval for the denominator (All completed orders within the reporting period). Average Completion Notice Interval utilizes the completion notice interval for the denominator (All completed orders which receive a notice within the reporting period).

**FLORIDA OSS BELL SOUTH'S RESPONSE TO OBSERVATION  
184**



Date: May 15, 2002

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation. (TVV1)

**Observation:**

**KPMG Consulting has not received timely fully mechanized Unbundled Network Elements-Loop (UNE-L) Firm Order Confirmations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface.**

**Background:**

According to Ordering measure O-9 of the Service Quality Measurement Plan<sup>1</sup>, BellSouth should return at least 95% of fully mechanized FOCs to Competitive Local Exchange Carriers (CLECs) within three hours of the local service request.

**Issue:**

During the production retest of the EDI interface, BellSouth returned 92.98 % of fully mechanized UNE-L FOCs during the three hour time frame, which does not meet Ordering measure O-9 of the SQM Plan.  
The following table lists the fully mechanized FOC timeliness results as of February 28, 2002.

	< 3 hrs	%	>=3 and <24 hrs	%	>=24 and <36 hrs	%	>=36 and <48 hrs	%	>=48 and <72 hrs	%	Total
Resale Business	39	97.50%	1	2.50%	0	0%	0	0%	0	0%	40
Resale Residence	61	100%	0	0%	0	0%	0	0%	0	0%	61
UNE-L	106	92.98%	3	2.63%	1	0.88%	0	0%	4	3.51%	114
UNE-P	113	99.12%	1	0.88%	0	0%	0	0%	0	0%	114
TOTAL	319	96.96%	5	1.52%	1	0.30%	0	0%	4	1.22%	329

The following PONs received a fully mechanized FOC after the three hour time frame:

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<sup>1</sup> BellSouth Florida OSS Revised Interim Performance Metrics Version 3.00, Issued June 1, 2001

# FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION

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Item #	PON	Ver	CC	LSR Sent	FOC Received	BellSouth's Findings
1	022011HPEJ101032	00	9993	03/11/02 01:35 PM	03/11/02 10:30 PM	Agree UNE-P, response delay due to a back end system communications issue that was resolved.
2	070922HPEH100008	00	9993	03/11/02 02:56 PM	03/11/02 10:30 PM	Agree UNE-L, response delay due to a back end system communications issue that was resolved.
3	006061HPEN001007	00	9990	03/21/02 01:46 PM	03/22/02 12:39 PM	Do not agree Resale Business, partial mechanized FOC timeliness standard should be used. KPMG weekly report indicates planned manual.
4	071051HPEI100003	00	7050	03/22/02 08:37 PM	03/25/02 08:33 AM	UNE-L w/LNP, partial mechanized FOC timeliness standard should be used. A Test Director entry will be opened to address this issue. KPMG weekly report indicates flow through.
5	071051HPEI100004	00	7050	03/22/02 08:42 PM	03/25/02 08:46 AM	UNE-L w/LNP, partial mechanized FOC timeliness standard should be used. A Test Director entry will be opened to address this issue. KPMG weekly report indicates flow through.
6	071051HPEI100006	00	7050	03/22/02 08:46 PM	03/25/02 08:55 AM	UNE-L w/LNP, partial mechanized FOC timeliness standard should be used. A Test Director entry will be opened to address this issue. KPMG weekly report indicates flow through.

# FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION

184

Item #	PON	Ver	CC	LSR Sent	FOC Received	BellSouth's Findings
7	071051HPEI100007	00	7050	03/22/02 08:50 PM	03/25/02 09:13 AM	UNE-L w/LNP, partial mechanized FOC timeliness standard should be used. A Test Director entry will be opened to address this issue. KPMG weekly report indicates flow through.
8	080012HPEH000002	00	9990	03/26/02 09:28 AM	03/27/02 09:38 AM	Do not agree UNE-L, partial mechanized FOC timeliness standard should be used. KPMG weekly report indicates partial mechanized due to BST error.
9	074021HPEH000002	00	9993	04/03/02 02:24 PM	04/04/02 12:32 PM	Do not agree UNE-L, partial mechanized FOC timeliness standard should be used. KPMG weekly report indicates partial mechanized due to BST error.
10	074021HPEF000004	02	9993	04/04/02 01:27 PM	04/04/02 04:50 PM	Agree UNE-Listing, FOC sent 18 minutes late due to a back end system communications issue that was resolved.

## Impact:

The receipt of timely fully mechanized FOC's is a critical factor in the CLEC's ability to process service requests in a timely manner. Delays in the return of FOC's could negatively impact the timeliness of CLEC order completion, lowering overall CLEC customer satisfaction.

# FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION 184

## BellSouth's Response:

BellSouth's agrees with KPMG on 3 of the 10 PONs submitted. The findings for each item are listed in the table above. A summary of the findings are listed below:

BellSouth Response Summary	UNE-L Item #	UNE-P Item #	Resale – Bus Item #	Total PONs
Agree Response delay due to a back end system communications issue that was resolved.	2, 10	1		3
<b>Total Agree</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>3</b>
Do Not Agree. Partial mechanized FOC timeliness should be used for planned manual fallout and BST errors.	8, 9,		3	3
Do not agree UNE-L w/LNP, partial mechanized FOC timeliness standard should be used. A Test Director entry will be opened to address the reporting issue.	4, 5, 6, 7,			4
<b>Total Do Not Agree</b>	<b>6</b>	<b>0</b>	<b>1</b>	<b>17</b>

The following table reflects BellSouth's results for the retest of timely fully mechanized FOCs via EDI.

	< 3 hrs	%	>=3 and <24 hrs	%	>=24 and <36 hrs	%	>=36 and <48 hrs	%	>=48 and <72 hrs	%	Total
Resale Business	39	100%	0	0%	0	0%	0	0%	0	0%	39
Resale Residence	61	100%	0	0%	0	0%	0	0%	0	0%	61
UNE-L	106	98.15%	2	1.85%	0	0%	0	0%	0	0%	108
UNE-P	113	99.12%	1	0.88%	0	0%	0	0%	0	0%	114
<b>TOTAL</b>	<b>319</b>	<b>99.07%</b>	<b>3</b>	<b>.93%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>322</b>



## O-13: LNP-Percent Rejected Service Requests

### Definition

Percent Rejected Service Request is the percent of total Local Service Requests (LSRs) which are rejected due to error or omission. An LSR is considered valid when it is electronically submitted by the CLEC and passes LNP Gateway edit checks to insure the data received is correctly formatted and complete, i.e., fatal rejects are never accepted and, therefore, are not included.

### Exclusions

- Service Requests canceled by the CLEC
- Scheduled OSS Maintenance

### Business Rules

An LSR is considered "rejected" when it is submitted electronically but does not pass edit checks in the ordering systems (EDI, TAG, LNP Gateway, LAUTO) and is returned to the CLEC without manual intervention.

**Fully Mechanized:** There are two types of "Rejects" in the Fully Mechanized category:

A **Fatal Reject** occurs when a CLEC attempts to electronically submit an LSR (via EDI or TAG) but required fields are not populated correctly and the request is returned to the CLEC.

*Fatal rejects are reported in a separate column, and for informational purposes ONLY. They are not considered in the calculation of the percent of total LSRs rejected or the total number of rejected LSRs.*

An **Auto Clarification** is a valid LSR which is electronically submitted (via EDI or TAG), but is rejected from LAUTO because it does not pass further edit checks for order accuracy. Auto Clarifications are returned without manual intervention.

**Partially Mechanized:** A valid LSR which is electronically submitted (via EDI or TAG), but cannot be processed electronically due to a CLEC error and "falls out" for manual handling. It is then put into "clarification", and sent back (rejected) to the CLEC.

**Total Mechanized:** Combination of Fully Mechanized and Partially Mechanized rejects.

**Non-Mechanized:** A valid LSR which is faxed or mailed to the BellSouth LCSC.

### Calculation

**LNP-Percent Rejected Service Requests** = (a / b) X 100

- a = Number of Service Requests Rejected in the Reporting Period
- b = Number of Service Requests Received in the Reporting Period

### Report Structure

- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized
- CLEC Specific
- CLEC Aggregate

### Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Not Applicable	• Not Applicable

### SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>• LNP</li> <li>• UNE Loop With LNP</li> </ul>	<ul style="list-style-type: none"> <li>• Diagnostic</li> </ul>

**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

## Norris, Sharon - LGA

---

To: Timmons, King C (K.C.), NCAM  
Subject: LNP Data Integrity Issue 5--28 letter

-----Original Message-----

From: Timmons, King C (K.C.), NCAM  
Sent: Tuesday, May 28, 2002 2:43 PM  
To: 'Phillip Porter - BellSouth'  
Subject: LNP Data Integrity Issue

Phil,

I have discovered potential data integrity issues with the March LNP data provided by BellSouth for several of AT&T's OCNs. I compared the March LNP LSR Flow Through Log with the LNP FOC Timeliness and Reject Interval raw data for all OCNs that would contain LNP LSRs. Below are summaries of my discoveries with supporting LSR data. Just to clarify, I consider an LSR a combination of PON and Version. I have analyzed the following AT&T OCNs: 7125, 7421, 7170, and 7562.

### **LNP LSR Flow Through Log - Issued Service Orders vs. LNP FOC Timeliness raw data file:**

The "Flowthrough(TotalFT)" tab in the LNP LSR Flow Through Log contains all of the LNP LSRs that became Issued Service Orders during March. Issued Service Orders are LSRs submitted electronically via the CLEC mechanized ordering process that flow through and reach a status for a FOC to be issued without manual intervention. Therefore, if I compare the LNP LSRs that are Issued Service Orders to the fully mechanized LNP LSRs from the LNP FOC Timeliness raw data, I would expect to see the same LSRs in both files. However, I discovered the following potential data integrity issues:

- There are 135 fully mechanized LSRs in the LNP FOC Timeliness raw data that do not appear in the LNP LSR Flow Through Log for Issued Service Orders.
- There are 9 Issued Service Orders in the LNP LSR Flow Through Log that do not appear at all in the LNP FOC Timeliness raw data.
- There are 725 Issued Service Orders in the LNP LSR Flow Through Log that appear as Partially Mechanized in the LNP FOC Timeliness raw data. This is a significant discrepancy (over 13%) considering there are 5482 Issued Service Orders in the LNP LSR Flow Through Log. This discrepancy suggests that either BellSouth is including Partially Mechanized LSRs incorrectly in the LNP Flow Through Report (improperly inflating Flow Through performance) or BellSouth is miscategorizing Fully Mechanized LSRs as Partially Mechanized in the FOC Timeliness Report (so the FOC Timeliness Report is incorrect).

Here is the supporting LSR data for the FOC discrepancies:

<< File: March 02 LNP FOC Discrepancies.xls >>

### **LNP LSR Flow Through Log - Auto Clarifications vs. LNP Reject Interval raw data file:**

The "Auto Clarifications" tab in the LNP LSR Flow Through Log contains all of the LNP LSRs that were auto clarified during March. I assume that if an LSR is auto clarified in the Flow Through report, it should appear as a Fully Mechanized rejection in the Reject Interval raw data file. However, I discovered the following potential data integrity issues in my analysis:

- There are 9 Auto clarifications in the LNP Flow Through raw data that do not appear at all in the LNP Reject raw data.
- There are 133 Auto clarifications in the LNP Flow Through raw data that appear as Partially Mechanized in the LNP Reject raw data. This is a significant discrepancy (over 25%) considering there are 514 auto clarified LSRs in the LNP LSR Flow Through Log.

Here is the supporting LSR data for the Reject discrepancies:

<< File: March 02 LNP Reject Discrepancies.xls >>

I am also attaching the March LNP LSR Flow Through Log I retrieved from PMAP:

<< File: 7125\_LNP\_LSR\_Flow\_Through\_Log\_032002.xls >>

Please respond to each of discrepancies I have uncovered. Are there documented business rules that would explain these discrepancies? If so, please list the LSRs that are affected by each business rule. If not, then please explain BellSouth's action plan for correcting each data integrity issue.

Please let me know if you have any questions about my analysis.

**KC Timmons**

Manager Supplier Performance Measurements

AT&T Local Services - Southern Region

Phone: 404-810-3914

Pager: 1-888-858-7243 Pin: 115394

Fax: 281-664-3671

e-mail: ktimmons@att.com

## Norris, Sharon - LGA

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**To:** Timmons, King C (K.C.), NCAM  
**Subject:** RE: Average Completion Notice Interval Issue\_5-29 letter

-----Original Message-----

**From:** Timmons, King C (K.C.), NCAM  
**Sent:** Wednesday, May 29, 2002 3:58 PM  
**To:** 'Phillip Porter - BellSouth'  
**Subject:** Average Completion Notice Interval Issue

Phil,

I have a few questions concerning the March Average Completion Notice Interval (ACNI) raw data. Attached is the ACNI raw data file after documented exclusions have been made. As you can see in the raw data file, I have added a new column (column B) that indicates if the SO\_NBR from the ACNI file is also present in the March Order Completion Interval (OCI) raw data file. The ACNI raw data file contains 10,307 non-trunk completion notices for orders that completed in March. Since these completion notices are for orders that completed in March, then I would also expect to see these same SO\_NBRs in the March OCI raw data file. However, there are 4,174 completion notices that do not have a corresponding SO\_NBR or PON in the OCI raw data. My specific questions are as follows:

1. Are there documented business rules that would explain why these 4,174 completion notices are not in the March OCI raw data?
2. If so, can BellSouth list the specific business rules and account for each of the 4,174 completion notices that are not present in the OCI raw data?
3. If there are no documented business rules that would explain this discrepancy, then why are the completion notices reported in the ACNI raw data missing corresponding completions in the OCI raw data?

<< File: March 02 ACNI Raw Data.xls >>

Thanks in advance for your attention on this potential data integrity issue. Please call me if you have any questions about the data I am providing.

**KC Timmons**  
Manager Supplier Performance Measurements  
AT&T Local Services - Southern Region  
Phone: 404-810-3914  
Pager: 1-888-858-7243 Pin: 115394  
Fax: 281-664-3671  
e-mail: ktimmons@att.com

## E. D. Charles Analytics

7000 Sweet Creek Road  
Duluth, GA 30097  
770-623-3480  
EDCHARLES@att.net



May 10, 2002

Mr. Philip W. Porter  
Manager  
BellSouth Telecommunications, Inc.  
Interconnection Service Operations  
675 West Peachtree Street, N. E.  
Suite 3F42  
Atlanta, GA 30375

Re: BellSouth letter dated April 22, 2002

Dear Phil,

In your letter of April 22<sup>nd</sup>, you asked that I let you know if your responses to my inquiries concerning AT&T Broadband LSR data left any of my questions unresolved. Many of your responses prompted further questions or lacked sufficient detail to answer my original questions. These responses are reproduced below. My concerns follow the responses.

***Q1. Does PMAP exclude Directory Listings in the Unbundled Network Element (UNE) Other Non-Design Ordering product category?***

***BellSouth Response:*** Directory listings Local Service Requests (LSR) were not counted in any product categories in PMAP prior to September 2001 data. Beginning with September 2001 data, directory listings were included in the 'UNE Other Non-Design' Ordering product category. However, consistent with the Service Quality Measurement ("SQM") Plan, directory listing LSRs are excluded from certain measurements for which data is reported in PMAP that prevent like-for-like comparisons with raw data for the Percent Reject Service Requests Report and the Flow Through Report.

The first two sentences in your response are very clear. The last sentence, however, merely seems to suggest that unexplained differences may occur among the PMAP reports, the Flow Through Reports and the raw data files which purportedly underlie all the reports.

I am much more concerned with the much larger gaps that exist within BellSouth's counts of AT&T Broadband's LNP LSRs, as discussed below under other inquiries. However, there are curious differences in Directory LSR counts that I believe can be satisfactorily understood only if BellSouth conducts its own comparison of the AT&T Broadband data in the applicable reports and provides specific explanations of each difference.

To facilitate such an analysis, here are the AT&T Broadband OCN 7170 & OCN 7562 UNE Other Non-Design counts in the PMAP CLEC reports vs. "Total Mech LSR's" in the Aggregate Flow Through Reports for December 2001 and January 2002:

AT&T Broadband UNE Other Non-Design Total Mechanized LSR Counts				
	December 2001		January 2002	
	OCN 7170	OCN 7562	OCN 7170	OCN 7562
Flow Through Aggregate Report	2,492	8,613	4,342	12,323
PMAP CLEC Ordering reports*	2,489	8,607	4,342	12,279
measurement gaps	3	6	0	44

\*% Reject Svc Request Total Mech  
FOC & Rej Resp Comp Total Mech

Your response should name and quantify the applicable measurements or other specific reasons that produced gaps between the counts in the PMAP CLEC Ordering reports and the Flow Through reports.

**Q2. Can BellSouth provide an example of an auto-clarified order that has been reclassified as partially mechanized?**

**BellSouth Response:**

*[The BellSouth Response provided, as requested, an example of the history of an LSR that was auto-clarified, then handled by a service representative, thus causing it to be classified as partially mechanized in the PMAP Percent Rejected Service Requests Report.]*

AT&T wishes to determine the magnitude of such occurrences and how much they might account for the apparent gaps in LNP data. A comparison of three sources of December 2001 LNP Fully Mechanized LSR counts is shown below:

AT&T Broadband December 2001 Fully Mechanized LSR Counts			
Report or File	Item	OCN 7170	OCN 7562
LNP_Flow_Through_122001	Rejects -- Auto Clarification	135	190
LNP PCT Reject Interval Service Requests	Fully Mechanized Reject Count	100	132
Ordering LNP Reject Interval and Percent Reject by Interval*	[count of rows after filtering]	100	132
	measurement gaps	35	58

\*filtered to include only rows where MECHZTN\_ID = '0', REJ\_IND = 'Y' and FATAL\_IND = 'N'

I believe from your response under Q1 above, it's safe to assume that no directory listing LSRs contributed to the gaps shown in the last row of the above table. Specifically, then, how many LSRs in the gaps were auto-clarified orders that were later reclassified as partially mechanized orders? Please list the specific PONs which were not counted in the LNP PCT Reject Interval Service Requests Miscellaneous Report because of this reclassification. What other reasons contributed to these apparent omissions? Please list the specific PONs that were not counted in the Miscellaneous Reports because of each of these other reasons.

**Q4. Electronic orders claimed by a service representative are classified as 'partially mechanized'. Is this still correct?**

**BellSouth Response:** Your understanding is correct. Electronic orders handled by a service representative are classified as partially mechanized, and, therefore, are not included in the Fully Mechanized Firm Order Confirmation (FOC) Report.

The initial (February 14<sup>th</sup>) BellSouth response to my inquiry contained the following phrase, referring to the Flow Through Report: "Includes LSRs that were submitted electronically and auto clarified, which may be classified by PMAP as partially or fully mechanized." (emphasis added) Just so my understanding is clear, are you saying in your April 22<sup>nd</sup> response that the answer BellSouth supplied in its original response of February 14<sup>th</sup> was incorrect?"

**Q5. The first worksheet is taken from the December 2001 LNP Aggregate Flow Through Report (LNP\_Flow\_Through\_122001.xls). The number I'm attempting to close to is 2526, "Total Mech LSRs" for Company 3 (presumably the code for OCN 7170). Is it correct to assume that this should be the total number of mechanized LNP standalone LSRs issued in December for OCN 7170?**

**BellSouth Response:** No, the "Total Mech LSRs" number on the % LNP Flow Through-Aggregate report consists of the total number [of] mechanically submitted LNP LSRs. This number includes all LNP products and is not limited to LNP Standalone LSRs.

In my examination of the December 2001 miscellaneous reports under OCNs 7170 & 7562, I did find product designations other than "LNP Standalone", as the above response suggests. These include "UNE Loop w/LNP", "UNE xDSL", various loop products and "INP Standalone". However, among mechanized orders for these designated products, only the "LNP Standalone" product category contained numerical entries other than zero

It appears, therefore, that no portion of the gap between the total LSR count of 2526 in the Flow Through Report and the count of 1859 LSRs in the miscellaneous reports may be attributable to products other than "LNP Standalone". Do you concur?

**Q6. The next three worksheets are taken from the December Miscellaneous Reports for OCN 7170. Note that on each sheet the number of total mechanized LNP standalone orders is 1859 [instead of 2526].**

**BellSouth Response:** The following three worksheets were taken from the December Miscellaneous Reports:

- a. LNP % Rejected Svc Requests
- b. FOC and Reject Responses Comp.
- c. Percent Rejected Svc Request

These three reports will not match the Flow Through report numbers due to differences in business rules between the various reports.

Given the amount of time that elapsed since I furnished the December reports BellSouth refers to, along with the December Flow Through report and the raw data, I was anticipating a much more complete explanation of the differences among them. Refer to the table below and please name, describe and quantify the "business rules" that account for each portion of the measurement gaps that



May 10, 2002

have occurred between these reports. More specifically, your response should contain a list and an explanation of the business rules or other reasons that the gaps occurred and the number of LNP orders excluded from the PMAP Miscellaneous Reports by each rule or reason. (Presumably, the total orders in your list will add up to the amounts shown on the last line of the table below.)

AT&T Broadband LNP Total LSR Counts				
	December 2001		January 2002	
	OCN 7170	OCN 7562	OCN 7170	OCN 7562
LNP Flow Through Aggregate Report	2,526	2,601	2,804	5,150
PMAP Miscellaneous Reports*	1,859	2,290	2,322	3,915
measurement gaps	667	311	482	1,235

\*LNP PCT Reject Interval Service Requests  
Firm Order Confirmation and Reject Response Completeness  
Percent Rejected Service Requests

(Copies of these reports for the month of December for OCN 7170 were furnished to BellSouth on 2/20/02. In order to advise BellSouth that the December gaps were not one-time occurrences, copies of the same reports for the month of January for OCNs 7170 and 7562 were furnished to BellSouth on 3/26/02.)

Although some portions of BellSouth's response were helpful, I feel I must point out that my AT&T clients and I were disappointed with the time it took to receive the final response. Because I had provided specific data and copies of the BellSouth reports in question, I patiently assumed that BellSouth was preparing a much more detailed and helpful overall response than the one sent on April 22<sup>nd</sup>. Unfortunately, my fundamental question, raised almost three full months ago about what are now five-months-old LSRs, remains unanswered.

My AT&T clients' expectations are that BellSouth will provide supporting detail when explaining gaps in data such as those that prompted my simple initial inquiry. Please inform AT&T or me if BellSouth is unable to comply with that expectation. Also, in order to avoid further delays, if you think any of my questions or the data I provided in this correspondence are not clear, please call me to discuss.

Finally, within 10 business days of the receipt of this correspondence, would you please give me an estimate of the date when BellSouth will provide a complete and detailed response?

Very truly yours,

  
E. D. Charles

Copies to: S. Norris, K. C. Timmons, AT&T Corp.

## **E. D. Charles Analytics**

7000 Sweet Creek Road  
Duluth, GA 30097  
770-623-3480  
EDCHARLES@att.net



May 14, 2002

Mr. Philip W. Porter  
Manager  
BellSouth Telecommunications, Inc.  
Interconnection Service Operations  
675 West Peachtree Street, N. E.  
Suite 3F42  
Atlanta, GA 30375

Re: BellSouth letter dated May 8, 2002

Dear Phil,

On May 10, I wrote you to ask for more detailed responses than some of the ones that BellSouth provided me in its April 22<sup>nd</sup> letter. The next day I received your letter of May 8, which responded to my March 26<sup>th</sup> e-mail message. In that e-mail message, I had transmitted selected January data to indicate that the December data gaps I had questioned were not one-time flukes.

Unfortunately, your latest correspondence essentially repeats some of the responses BellSouth provided on April 22 and will not be of any help to me. I believe my May 10<sup>th</sup> letter describes the level of detail BellSouth needs to provide in order to clear up my concerns. Thanks.

Very truly yours,

E. D. Charles

Copies to: S. Norris, K. C. Timmons, AT&T Corp.



BellSouth Telecommunications, Inc.  
Interconnection Services Operations  
675 West Peachtree Street, N.E.  
Suite 3F42  
Atlanta, GA 30375

Philip W. Porter  
Manager  
404-927-2182  
Phillip.Porter@bellsouth.com

May 21, 2002

Mr. E. D. Charles  
Analyst, E. D. Charles Analytics  
7000 Sweet Creek Rd.  
Duluth, GA 30097

Dear Don:

Pursuant to your arrangement with AT&T and with the express authorization of K.C. Timmons of AT&T, BellSouth hereby acknowledges receipt of your May 10, 2002 letter concerning the Local Number Portability (LNP) Flow Through Comparisons with Miscellaneous Reports. BellSouth is in the process of investigating the substantive issues you have raised and will provide you with a response upon completion of the investigation. In the meantime, I wanted to address your "disappointment" in the timeliness and thoroughness of BellSouth's prior response and your "expectations" about future responses from BellSouth.

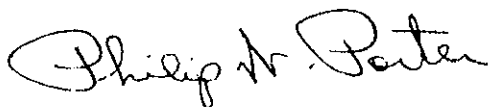
BellSouth endeavors to respond to questions raised about performance measurement data as promptly as possible. However, the issues you have raised are not the only performance measurement issues raised by AT&T. In fact, BellSouth has devoted substantial time and effort in responding to allegations about BellSouth's performance data asserted by AT&T on a variety of fronts, including allegations before the Federal Communications Commission; allegations before various state public service commission proceedings in BellSouth's region; and in response to a multitude of letters from AT&T representatives. BellSouth will continue to respond to all of AT&T's and its agents requests in as timely a fashion as possible.

With respect to your "expectations" about the substance of future responses from BellSouth, our goal is to answer the questions you have asked. If you ask for underlying data or if such data is necessary to adequately answer your questions, BellSouth will provide it, assuming the data is reasonably available or is not otherwise available to AT&T through the variety of systems and databases available to AT&T. Because the effort required to answer questions concerning performance measurements data can vary considerably, it is not possible for BellSouth to provide "an estimate of the date when BellSouth will provide a complete and detailed response" to your May 10, 2002

letter. BellSouth will endeavor to provide a substantive response as quickly as possible, and I will provide you with periodic updates as to our progress.

Thank you again for your letter, and please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, reading "Philip W. Porter". The signature is written in a cursive style with a large, looped "P" and "W".

Philip W. Porter

Cc: B. Ross  
J. Gordon